

13-003

**Universal Underwriters Insurance Company
as subrogee of King Chrysler Jeep Dodge LLC
v. Dedicated Logistics, Inc., et al.
v. Pennsylvania Power Company**

Date of accident: 05/19/11

Location: New Castle, PA

EXPERT REPORT

==TRANSCon CSI==

CRASH SCENE INVESTIGATIONS

**Prepared For:
Edward A. Yurcon, Esquire
Anstandig, McDyer & Yurcon, P.C.
1300 Gulf Tower, 707 Grant Street
Pittsburgh, PA 15219**

**By: Glen Reuschling
President**

**1509 West Street
Annapolis, Maryland 21401**

Office 410-626-9996

Fax 410-626-9997

April 29, 2013

**Universal Underwriters Insurance Company
as subrogee of King Chrysler Jeep Dodge, LLC
v. Dedicated Logistics, Inc., et al.
v. Pennsylvania Power Company**

TransCon CSI File No: 13-003

Introduction Section – Phase 1.0

Investigative Focus – Phase 1.1:

At the request of Edward A. Yurcon, Esquire, TransCon CSI (hereinafter "TCSI") conducted an investigation into an incident that occurred on May 19, 2011 at 3239 Wilmington Road (Route 18) in New Castle, PA.

Materials Reviewed – Phase 1.2:

Our analysis of this incident has enabled us to form several opinions within a reasonable degree of scientific certainty within the multiple disciplines of motor vehicle collision reconstruction. Our opinions are based in part upon the review of the following:

List of Items Reviewed – Phase 1.3:

1. Site visit on February 28, 2013.
2. TCSI site photographs (99), taken on February 28, 2013.
3. TCSI site Leica C10 internal digital images (18,438), taken on February 28, 2013.
4. TCSI site Nodal Ninja external images (207), taken on February 28, 2013.
5. TCSI exemplar tractor and trailer Nodal Ninja external images (352), taken on February 26, 2013.

6. TCSI point-cloud data obtained during inspection on February 26, 2013 of TCSI's scan of exemplar tractor and trailer to be used in the drafting of a 3D model.
7. TCSI point-cloud data obtained during site visit February 28, 2013 using Leica Cyclone software capturing the site to be used in the drafting of a 3D model.
8. TCSI used CAD Zone software for the Computer Aided Drafting (CAD) applications providing a 2 & 3 dimensional (2D/3D) diagram and model.
9. Diagrams provided and photographs (235) taken by Churchwell Fire Consultants.
10. "Damage claim" photographs (43) provided by Pennsylvania Power Company.
11. "Adjuster photos" (90) taken by Don McKnight, provided in discovery by White and Williams LLP.
12. "King Chrysler Fire Insured Photos" (99), provided in discovery by White and Williams LLP.
13. "King Chrysler 11-0000184" photographs (50), provided in discovery by White and Williams LLP.
14. "King Chrysler Fire 5-19-11 5570093406" photographs (115), provided in discovery by White and Williams LLP.
15. Thomas Martin, Jr. photographs (68), taken at the Tri-County Industries facility on March 11, 2013.
16. Neshannock Township Fire Department Report, Incident Number 11-0000184, dated 05/19/2011, prepared by CP David J. Congini, ID #01-DJC9602.
17. Neshannock Township Police Dept. Incident Report, Incident #: 11-2367, dated 5/19/11.
18. Neshannock Township Police Department Notice of Accident Investigation, Incident Number 11-2367, dated 5/19/11, prepared by Officer Dewitt, I.D. #3405.
19. Notes prepared by Earnell Harris.
20. Dedicated Logistics Traffic Crash Report, prepared by Earnell Harris on 5/19/11.
21. Pre-dated *Google Earth* aerial views of the site prior to the incident.

22. Zurich American Insurance Company's policy and adjusting file.
23. FirstEnergy's claims file.
24. Complaint filed by Universal Underwriters Insurance Company, etc. v. Dedicated Logistics, Inc.
25. Answer to Complaint and Affirmative Defenses filed by Defendant Dedicated Logistics, Inc.
26. Third Party Complaint against Pennsylvania Power Company filed by Dedicated Logistics, Inc.
27. Answer to Third-Party Complaint, Counter-Claim against Dedicated Logistics, Inc. filed by Defendant Pennsylvania Power Company.
28. First Amended Complaint against Dedicated Logistics, Inc. and Pennsylvania Power Company filed by Universal Insurance Company, etc.
29. Answer to First Amended Complaint and Crossclaim filed by Defendant Dedicated Logistics, Inc.
30. Answer to First Amended Complaint and Cross-Claim against Dedicated Logistics, Inc. filed by Defendant Pennsylvania Power Company.
31. Answer to Crossclaim of Pennsylvania Power Company filed by Defendant Dedicated Logistics, Inc.
32. Answer to Cross-Claim and Counterclaim against Dedicated Logistics, Inc. filed by Defendant Pennsylvania Power Company.
33. Answer to Counterclaim of Pennsylvania Power Company filed Dedicated Logistics, Inc.
34. Defendant Dedicated Logistic, Inc.'s Answer and Affirmative Defenses to Counterclaim of Pennsylvania Power Company to Dedicated Logistics, Inc.'s Crossclaim.
35. Plaintiff's Rule 26 Disclosure Statement filed by Universal Underwriters Insurance Company.
36. Defendant's Initial Disclosures Required by Fed. R. Civ. P. 26(a)(1)(A) filed by Dedicated Logistics, Inc.
37. Federal Rule 26(a)(1)(A) Initial Disclosures of Defendant Pennsylvania Power Company.

38. Defendant Pennsylvania Power Company's Answers and Objections to Plaintiff's First Set of Interrogatories Addressed to Defendant Pennsylvania Power Company.
39. Pennsylvania Power Company's Answers and Objections to Interrogatories, Requests for Production of Documents filed by Defendant Dedicated Logistics, Inc.
40. Defendant Pennsylvania Power Company's Responses and Objections to Plaintiff's First Set of Requests for Documents Addressed to Defendant Pennsylvania Power Company.
41. Defendant Dedicated Logistic, Inc.'s Answers to Interrogatories Directed to Dedicated Logistics, Inc.
42. Defendant Dedicated Logistic, Inc.'s Responses to Plaintiff's Request for Production of Documents.
43. Privilege Log for Document Production filed by Defendant Dedicated Logistics, Inc.
44. Privilege Log for Jim Haberkorn's file filed by Defendant Dedicated Logistics, Inc.
45. Deposition transcript of Ronald Arms.
46. Deposition transcript of Michael Busin.
47. Deposition transcript of Flora Canty.
48. Deposition transcript of David Congini.
49. Deposition transcript of Randy Crumb.
50. Deposition transcript of Jeremy Dewitt.
51. Deposition transcript of John Dicola.
52. Deposition transcript of Mike Genova.
53. Deposition transcript of William Glenn.
54. Deposition transcript of Paul Engel.
55. Deposition transcript of James Haberkorn.
56. Deposition transcript of Earnell Harris.

57. Deposition transcript of Mark Kepins.
58. Deposition transcript of Michael King.
59. Deposition transcript of Thomas Lirette.
60. Deposition transcript of Christopher McDermott.
61. Deposition transcript of Scott McMaster.
62. Deposition transcript of Darryl "Bud" Myers.
63. Deposition transcript of Jeff Moser.
64. Deposition transcript of Raymond Shacklock.
65. Deposition transcript of Brad Smith.
66. "SaferSys Report" for Dedicated Logistics, Inc., DOT #618375, from 02/11/2011 to 02/11/2013.
67. Structural Engineer's Report, dated June 10, 2011, prepared by Richard E. Rylott, Jr., P.E., representing R Thre3 Design LLC.

Pre-Crash Section – Phase 2.0

Location – Phase 2.1:

This incident was reported to have occurred at the King's Chrysler Dealership located at 3239 Wilmington Rd, New Castle, PA 16105.

It was reported that:

"May 19, 2001 (sic) at 03:55 hrs this station along with automatic aid Stations, 200 and 1100 fire, Neshannock police and Station 8200 EMS were dispatched for a commercial structure fire at the Kings Chrysler auto body shop. Dispatch reported that a truck had stuck power lines and that the building was on fire. Upon arrival of first due (sic) officer, Chief

101, flames and heavy smoke were emitting through the roof at the rear (D side) of the body shop. Body shop was a Type II construction, metal building. The utility pole and wires were laying on the building with utility wires laying across the driveway to the body shop and across the rear parking lot with the neighboring lot of G.O. Crivelli Automotive. Access was extremely limited due to the downed wires. The immediate fire area had an air compressor shed attached to the structure. The shed and contents were on fire..."

"Cause"

"The fire was reported by the delivery truck driver who was delivering parts to Kings Chrysler. It appears that the driver of the tractor/trailer was attempting to maneuver his truck and trailer in the rear lot of the body shop. Driver sttaed (sic) that some part of the tractor/trailer came in contact with the utility wires supplying power to the body shop and balance of the property. Upon contacting the utility wires the pole broke at the base and fell on top of the body shop. The pole contained two transformers as well as the main power lines. When the pole contacted the roof of the structure the transformers broke off the pole and fell through the roof of the body shop coming to rest on the floor of the structure. Fire erupted as a result of the sparks and oil in the transformers causing a vehicle inside of the body shop to catch fire that was adjacent to were (sic) the transformers landed. As the heat inside the structure increased and thermal layering began a storage area on top of the body shop office across from the fire area became involved in fire when paper records and tires were ignited due to the

*high temperatures at the ceiling. Cause is ruled
accidental in nature."*

[Quoted directly from Neshannock Township Fire Department Report, Incident Number 11-0000184]

Driver #1 (D1) Identification – Phase 2.2:

Earnell Harris
23951 Lakeshore Blvd., #308B
Euclid, OH 44132
Date of Birth: 3/14/1979
License State: OH
License No.: RP954111
License Class: Not noted
Restrictions: Not noted

Vehicle #1 (V1) Identification – Phase 2.3:

2011 Peterbilt
VIN: 1XPHA48X8CD143167
Registration State: MN
Tag #: PAK8386
Registered Owner:
Dedicated Logistics, Inc.
2900 Granada lane North
Oakdale, MN 55128

Site Section – Phase 3.0

Site Description – Phase 3.1:

On February 28, 2013, TCSI conducted a site visit and a HDS 3D laser scan of the utility poles, power lines, and the surrounding exterior environment of the King's Chrysler dealership located at 3239 Wilmington Road, New Castle, Pennsylvania.

The purpose of the HDS 3D laser scan was to assist in accurately documenting the current conditions of the utility poles, power lines and the surrounding environment of the King's Chrysler dealership in a 3D model. It is the intention of TCSI that the computer-generated evidence will be visually presented by use of the following computer software programs:

1. CAD Zone software. CAD Zone is a 2 & 3 dimensional (2D/3D) computer aided drafting program (CAD).
2. Leica Geosystems Cyclone software. Cyclone software is 3D laser point cloud management and measurement program.

The intent of the use of the computer generated evidence is to further enhance the verbal or written opinion with the use of the visual support needed to clarify an opinion or comment.

All electronic data is proprietary to their respective software programs. The measurement data produced by TCSI's 3D laser scanner require the use of the above listed software programs. Both programs were used to obtain distance and angle measurements. The CAD Zone software was used for pre-crash, crash, and post-crash dynamic position analysis.

In addition, we were requested to conduct the following:

1. Take measurements of the existing pole and guy wire adjacent to the location where the body shop existed prior to the fire.
2. Measure the clearances of the lowest power lines (coming through the alleyway) and roof overhang(s).
3. Scan an exemplar tractor and trailer and place the 3D model under the power lines adjacent to back corner of the body shop that existed prior to the fire.
4. Utilize the point cloud data for crash reconstruction purposes.
5. The computer generated evidence illustrates the sequence of the event based upon the foundation established during the interpretation of evidence phase of the investigation.

TCSI was met by Edward A. Yurcon, Esquire, Anstandig, McDyer & Yurcon, and Robert Simpson of RA Simpson Consulting. Glen F. Reuschling and David A. Buerger of TCSI conducted a pre-scan evaluation of the environment in order to ensure each scan world would properly capture the topography, building structures, and the utility poles. A series of 14 separate scan worlds were completed using a Leica C10 high definition 3D laser scanner on medium resolution and supplemented with internal and external images.

On February 26, 2013, two (2) days prior to the site visit, a HDS 3D laser scan was also conducted of an exemplar tractor and trailer. The purpose of the scan was to accurately document the current conditions of an exemplar tractor and trailer so it could be integrated into the HDS 3D laser scan model space of the King's Chrysler dealership. David A. Buerger conducted a pre-scan evaluation of the tractor and trailer in order to ensure scan worlds would capture the objects. A series of 13 separate scan worlds were completed of the exemplar tractor and trailer using a high definition Leica C10 3D laser scanner on medium resolution with external images.

High Definition Survey (HDS) 3D Laser Scanning Technology

TCSI's Leica C10 Scan Station is a high definition surveying grade 3D laser scanning device that is used by architects, engineers and surveyors in a variety of applications including that of accurately documenting "as built" or existing conditions. The accuracy of the technology, along with its ability to duplicate the environment in a variety of 3D deliverables, creates the ideal application for forensics, motor vehicle and industrial accidents.

There are two basic components of HDS 3D laser scanning. First is the field work where the laser scanner, operated by technicians, captures the environment creating measurable XYZ point cloud data. The second is the rendering component where scan data is processed and registered by manufacturer trained personnel in an office setting. This technology is extremely specialized. Therefore, it is imperative that the field technicians and personnel processing are trained by the manufacturer and work with the technology on a regular basis, as well as attend annual refresher training. TCSI employees involved in this investigation are currently manufacturer trained and maintain proficiency through daily use of this state-of-the-art technology.

The Leica C10 3D laser scanner used in our investigation is a line of sight device that collected measurable XYZ data on every visible object within the range established during TCSI's initial site review. The scanner was positioned so that all targeted areas were visible. The range of the scanner was dependent on the reflectivity, color, and the angle of the targeted areas in relation to the placement of the 3D laser scanner, as well as any sight obstructions. The Leica C10 3D laser scanner captured 50,000 measurable data points per second and was supplemented by photo realistic images. The images were taken by an internal four (4) megapixel camera and an external 15 megapixel digital camera and are blended into the data points giving the scan data a photo realistic view.

External images were taken using a 15 megapixel digital camera with a fish-eye lens and a Nodal Ninja bracket. The stitching of external images, known as a Cyclone External Camera Workflow, creates high quality images that were texture mapped to the scan data.

After scanning, the camera was placed into a special nodal ninja bracket that was placed on the same tribrach as the 3D laser scanner. The fish-eye lens mounted on the camera was positioned on the bracket so that the focal center of the lens matched the optical center of the scanner. The captured images were processed into cubed images and texture mapped to the scan data.

In addition to a substantial increase in megapixel, the external interface allows the technician to choose the timing of the capture of the image, which is helpful in incidents that involve pedestrian and vehicle traffic, and inclement weather.

The number of scan worlds was dependent on the area/environment, the topography, and the number of visual obstructions that existed. The scan worlds produced were then overlapped and registered together through their common points. TCSI utilized a single high definition twin-target pole for verification purposes. In this case, the multiple scan worlds were registered together using common points ("cloud to cloud").

The Leica C10 ScanStation, in addition to being factory calibrated, has internal checks testing its calibration to ensure that it is running properly. All calibration checks were verified and the unit was found to be functioning properly. In addition, a field and controlled validation was conducted to verify the accuracy of the data produced by the HDS 3D laser scanner. The Leica C10 3D laser scanner produces point cloud data accurate within 4-6mm. The accuracy of the Leica C10 ScanStation has been routinely accepted in courts throughout the United States, and has passed both the Daubert and Frye challenges. In the field, accuracy within 1/8 of an inch has routinely been obtained by TCSI. These checks and balances by manufacturer trained personnel were followed during the course of this forensic evaluation.

The purpose of our service was to assist in accurately documenting the current conditions of the environment and archive the data for use as a demonstrative tool for litigation purposes. The data obtained can also be used to further illustrate numerous viewer perspectives during various aspects of the event being documented through the use of

computer-aided design (CAD) software programs. In this case, CAD Zone software was used to enhance the deliverables for the purpose of accurately displaying variable setups.

Results of Forensic Measurements

The following inserted screen shots (Figures 1 through 7) of scan data represent the results of TCSI's forensic analysis:

Pole and Anchor Positioning

Figure 1 (below) is the rear parking lot view (facing east) of the pole, anchor and guy wire.

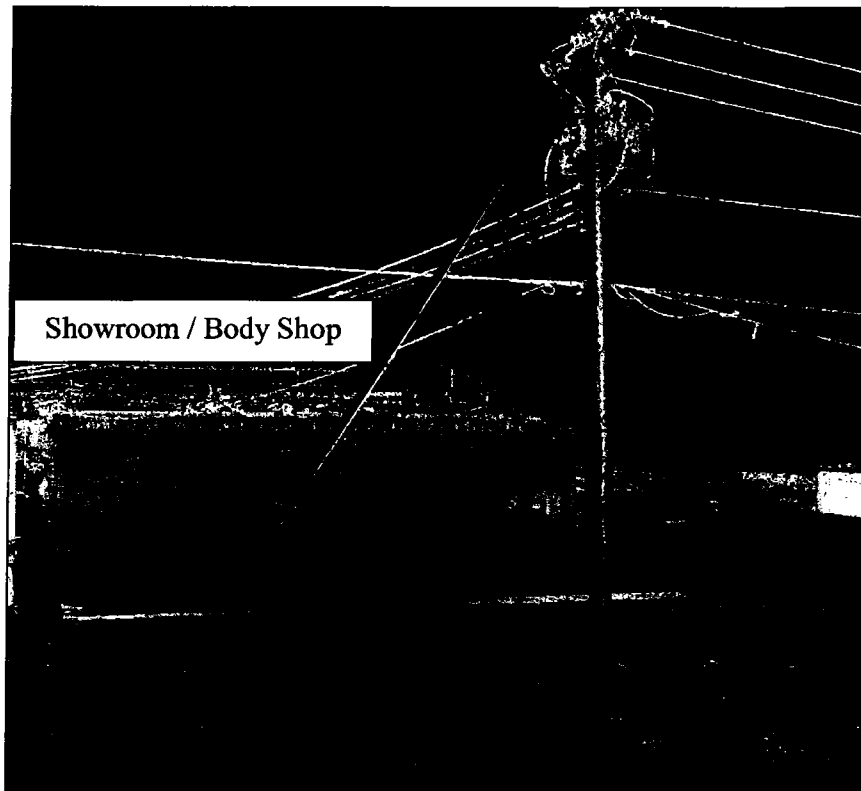


Figure 1

Dealership Clearance Measurement

Figure 2 (below) is the parking lot view (facing west) coming from Route 18 and entering the alleyway.

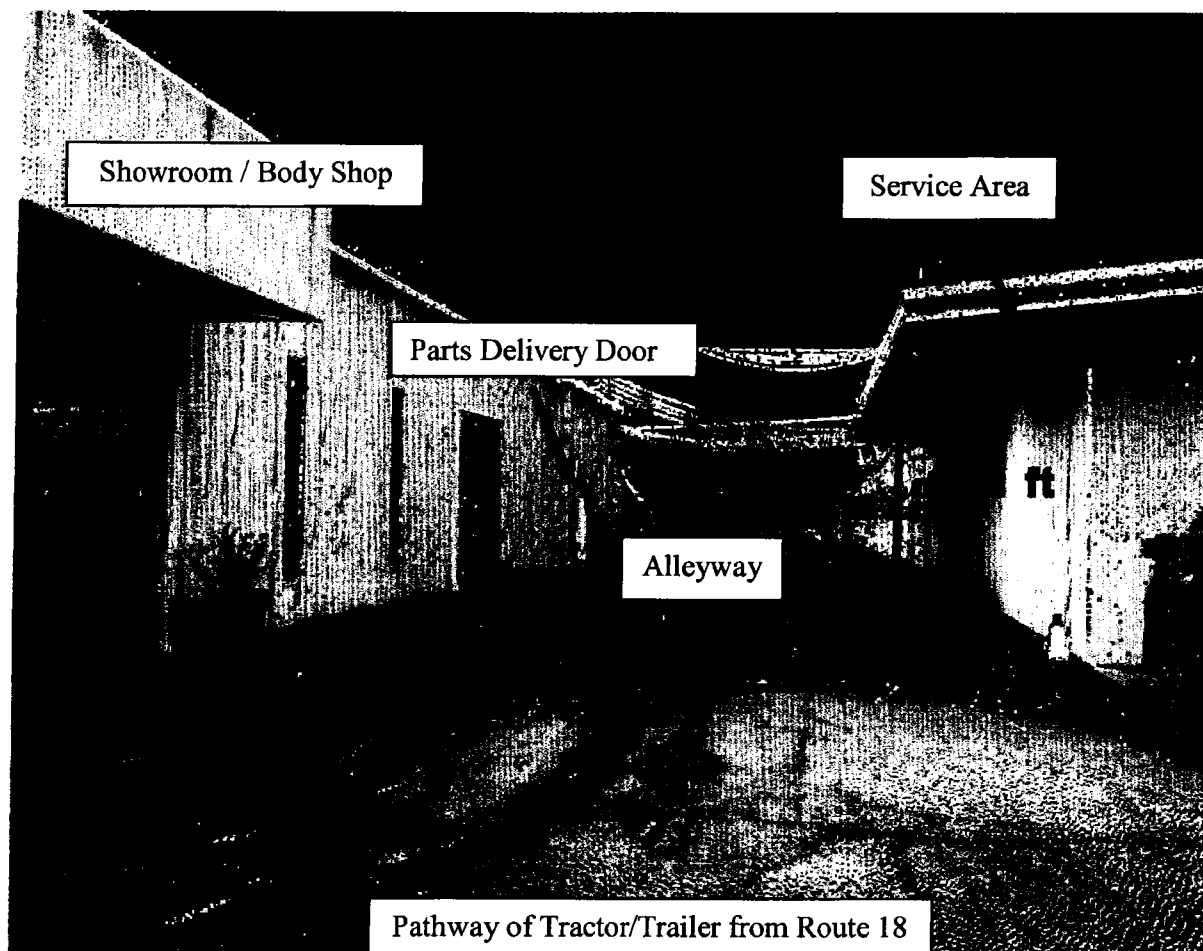


Figure 2

Figure 3 (below) is a bird's eye view of the set of lines in the alleyway.

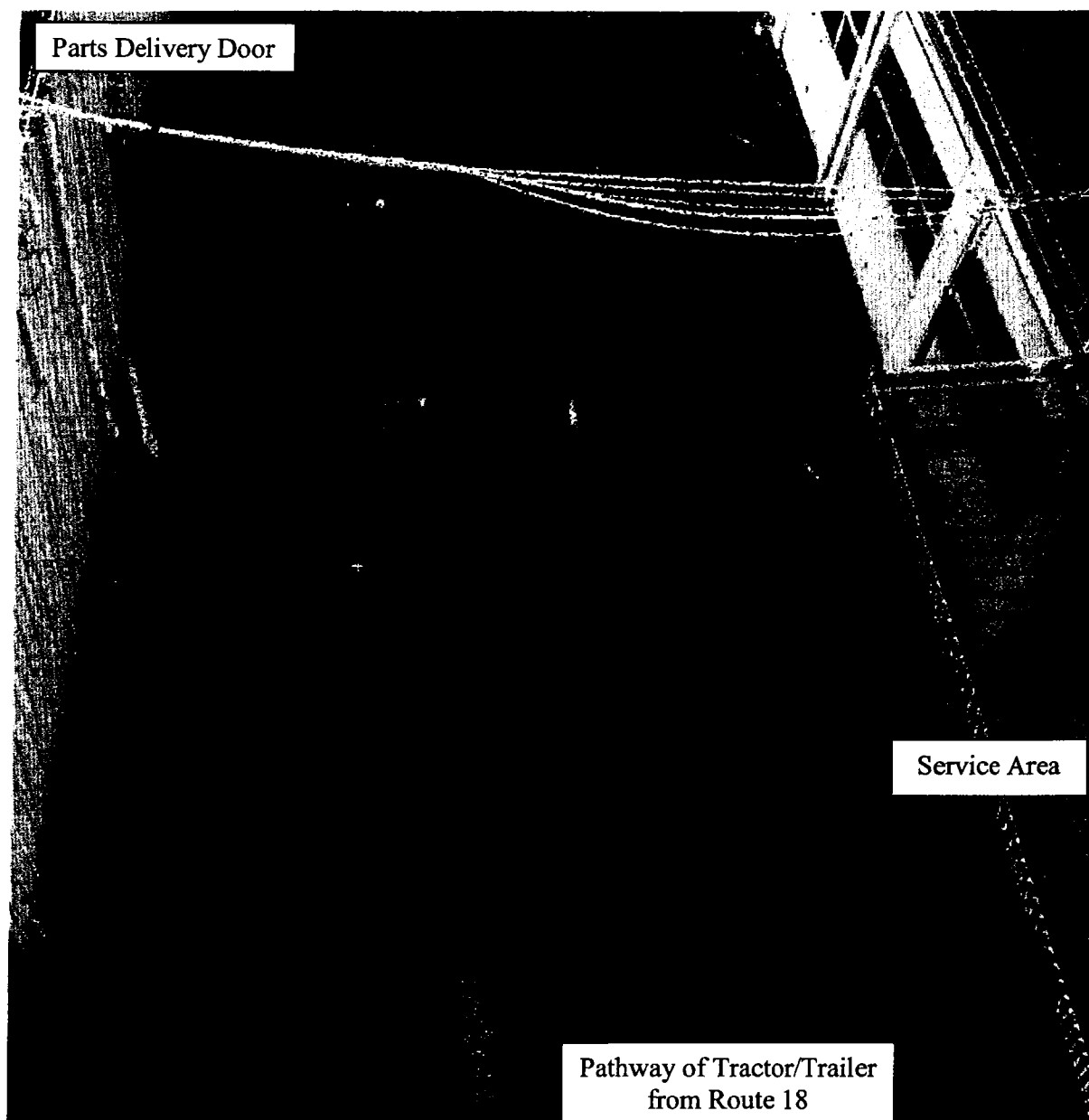


Figure 3

Figure 4 (below) is a view (facing north) of the Service Area just prior to the compressor shed.

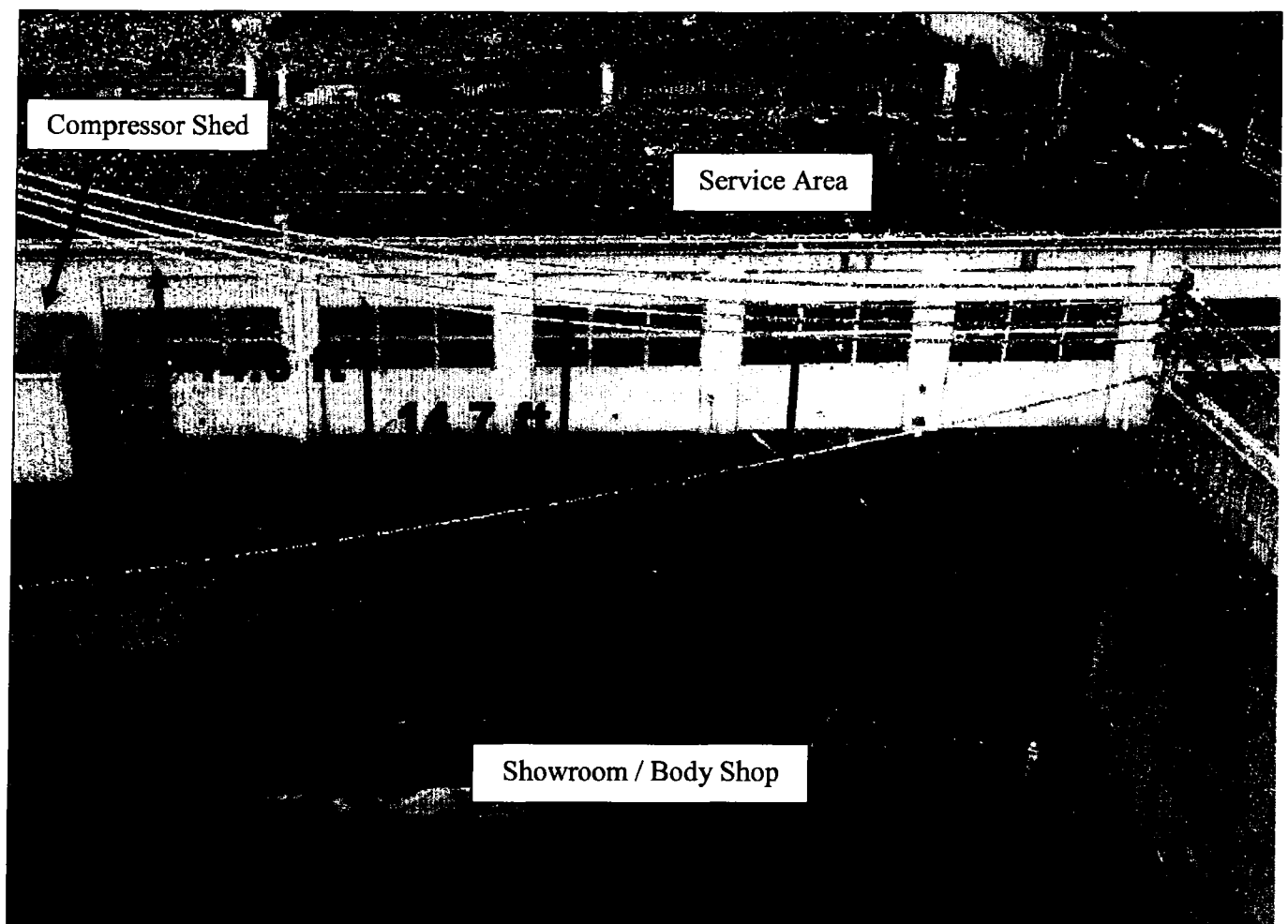


Figure 4

Figure 5 (below) is a birds-eye view of above the alleyway just prior to the rear parking lot.

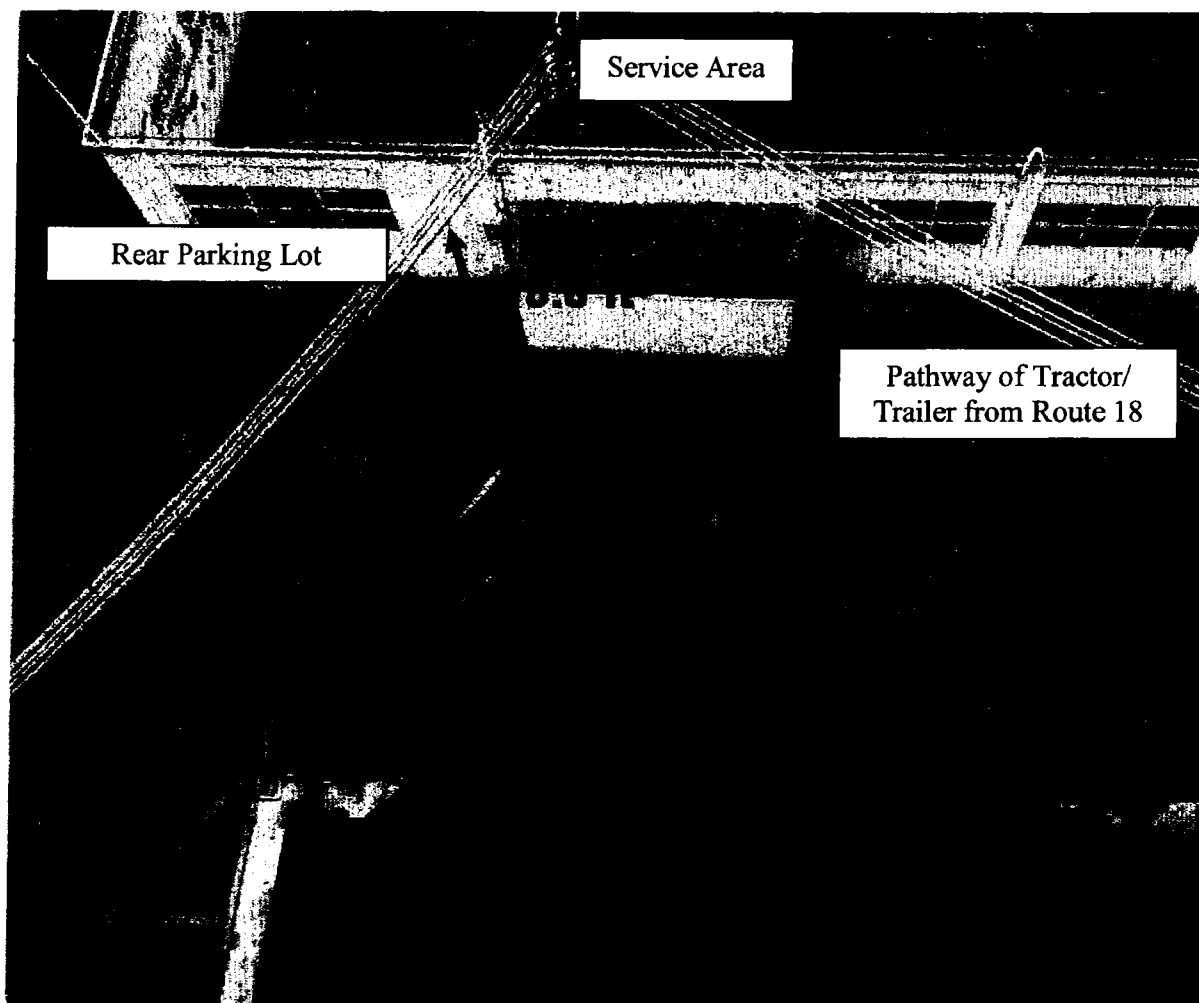


Figure 5

Exemplar Tractor and Trailer - Clearance to the Lowest Line Near the Guy Wire

Figure 6 (below) is a view, facing west, of the showroom/body shop side of the alleyway depicting an exemplar tractor and trailer below the power lines adjacent to the guy wire at the entrance of the rear parking lot.

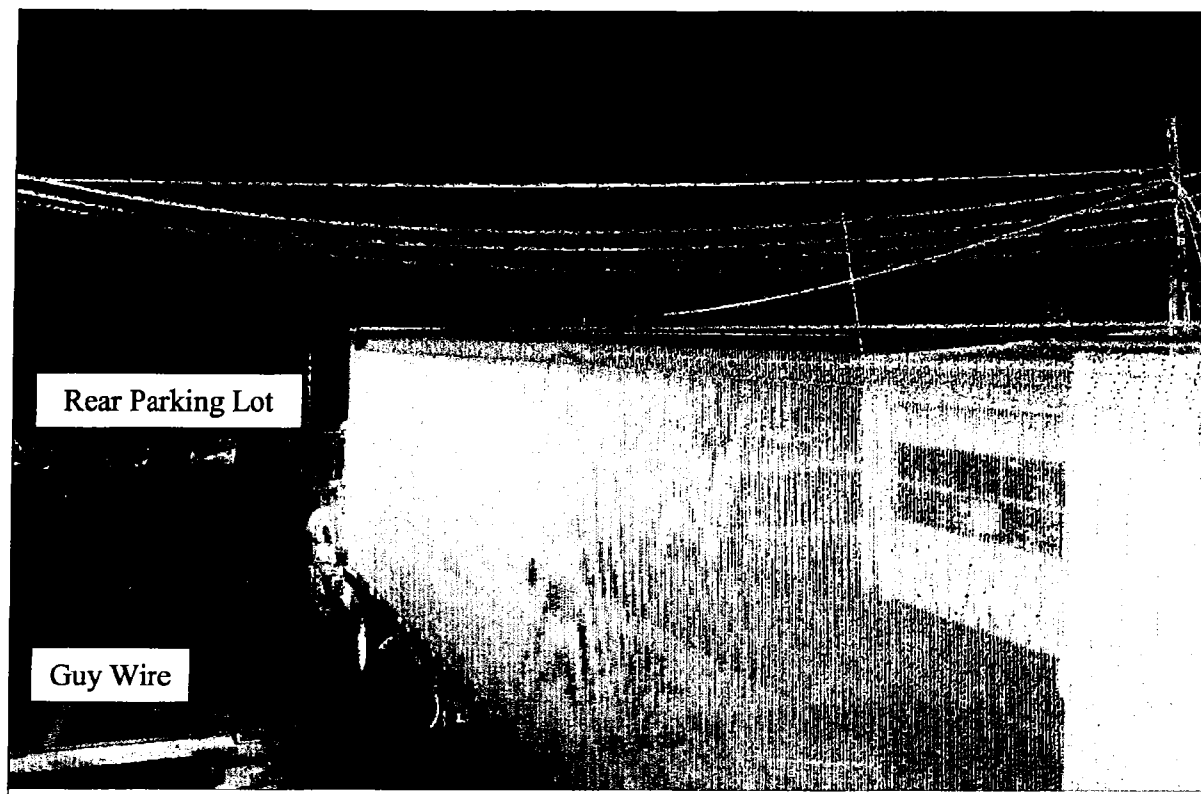


Figure 6

Figure 7 (below) is a view, facing north, of the showroom/body shop side of the alleyway depicting an exemplar tractor and trailer below the power lines adjacent to the guy wire at the entrance of the rear parking lot.

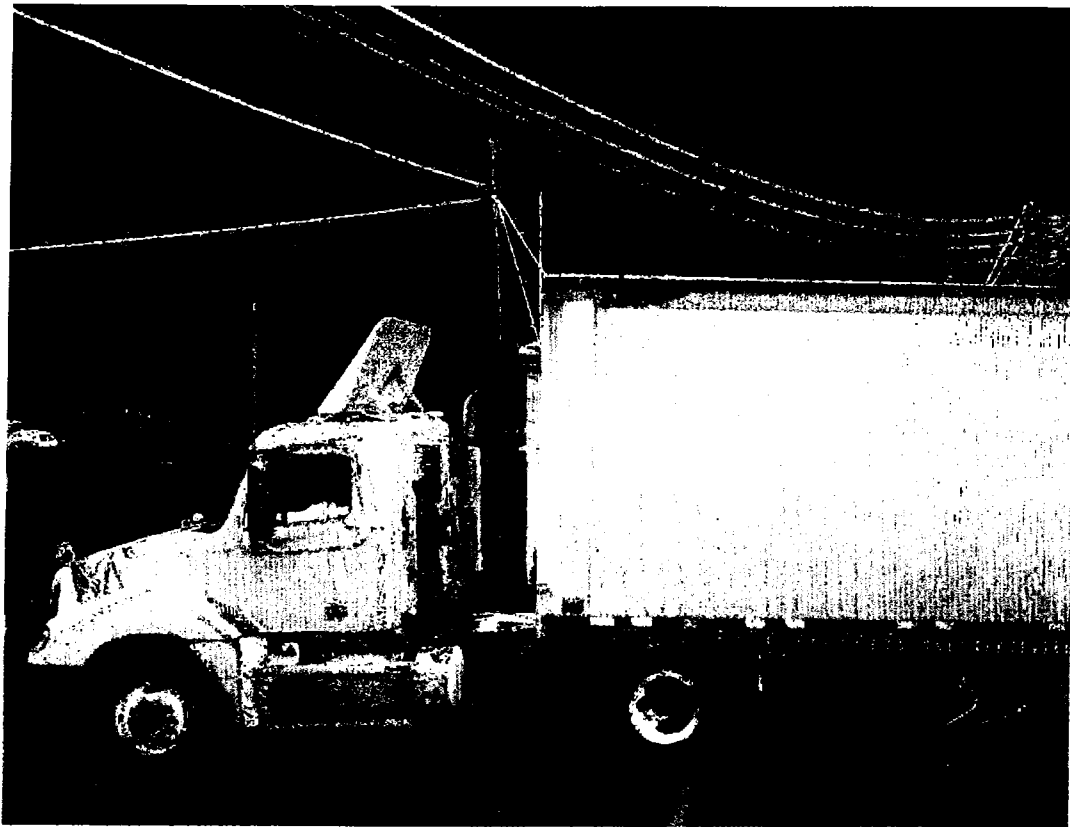


Figure 7

Investigation Section – Phase 4.0

Reconstruction - Phase 4.1:

The purpose of this section is to evaluate the available evidence and/or lack of evidence and to reconstruct this incident to demonstrate the sequencing of events that caused this accident.

After the material received was reviewed, TCSI was able to reconstruct this incident.

The tractor/trailer was photographed at a much later date (October 31, 2012) by Churchwell. Although the photographs of the tractor/trailer helped to support the findings associated with the dynamics of this event, there was a lack of detail in the photographs taken, specifically of the right side trailer tires. An exemplar tractor and trailer were scanned to assist in the placement at the dealership.

The topography, building outline, pole and guy wire placement were all specifically documented by way of the HDS 3D laser scan conducted on the grounds of the dealership.

The evaluation was conducted using the point cloud data collected at the dealership, as well as the scan of the exemplar tractor and trailer. In addition, CAD Zone, a CAD software program, was used to integrate the point cloud data with the CAD data.

After evaluating this case, we have come to the following conclusions:

1. Mr. Harris exited from Route 18 into the dealership by-passing a large available parking area adjacent to Route 18 in front of the dealership as an alternative [Harris Deposition page 59, line 13; Harris Deposition Exhibit #2; Harris Deposition pages 72 through 74].

2. Mr. Harris entered the “driveway” (alleyway) and parked the rear of his trailer near the parts door adjacent to the showroom/body shop building. Mr. Harris successfully traversed the alleyway under several overhead lines without incident [Figure 2, Figure 3, and Figure 14], [Harris Deposition page 73, line 2; Harris Deposition pages 78 through 79; Lirette Deposition page 30, lines 2 through 5; Lirette Deposition Exhibit #1].
3. Mr. Harris positioned his tractor/trailer in the alleyway between the showroom/body shop and service buildings in order to offload his cargo (auto parts) [Figure 12] [Harris Deposition page 73, line 25; Harris Deposition pages 78 through 79].
4. The tractor/trailer was positioned “parallel” and facing the rear parking lot approximately three (3) to four (4) feet from the building [Figure 12], [Harris Deposition page 73, line 25; Harris Deposition page 82, line 24 through page 83, line 3; Harris Deposition page 83, lines 8 through 12].
5. The rear of the trailer was near the sidewalk ramp and doorway to the Parts Department of the dealership [Figure 12], [Harris Deposition page 73, line 25; Harris Deposition page 82, line 24].
6. After offloading the cargo, Mr. Harris testified that he got back into the tractor and proceeded to turn around in the rear parking lot. In doing so, Mr. Harris initiated a right turn as his tractor cleared the service area building on his right [Figure 13 and Figure 14], [Harris Deposition page 88, line 3; Harris Deposition page 88, line 10; Harris Deposition Exhibits 5 and 6].
7. Mr. Harris testified that he continued to drive around the rear parking lot making “a right and then a left” turning maneuver. Mr. Harris made a series of two (2) left turns around parked cars off to his tractor’s left side [Figure 15, Figure 16 and Figure 17], [Harris Deposition page 89, lines 5 through 16; Harris Deposition page 90, lines 9 through 14].
8. Mr. Harris continued driving in a “parallel” configuration until he reached the southern end of the rear parking lot [Figure 18] [Harris Deposition page 91, line 16; Harris Deposition page 92, lines 3 through 6].
9. When Mr. Harris got to the southern end of the rear parking lot, he maneuvered his tractor/trailer into a left turn attempting to position his unit to pass through the alleyway. Mr. Harris conducted this maneuver while avoiding parked vehicles off to his left in the rear parking lot. At this position, Mr. Harris loses sight of the right

side of his trailer [Figure 19, Figure 20, and Figure 21] [Harris Deposition page 92, lines 14 through 17].

10. Mr. Harris' tractor entered the alleyway in an easterly direction. While making his right turn into the alleyway, Mr. Harris' trailer experienced a right-sided off-tracking event. An off-tracking event with a tractor/trailer can occur at slow speeds (i.e., parking lot speeds) when the tractor turns (left or right) and the trailer tires "track" inside the tractor tires. The severity of the off-tracking (distance trailer tires "track" inside the tractor tires) is dependent upon the turning radius (left or right) of the tractor. During this trailer off-tracking event, Mr. Harris' first-axle-right trailer tire, which "tracked" inside the right turning tractor, made contact with the guy wire anchor positioning system [Figure 22, Figure 23, Figure 24, Figure 25, Figure 26, Figure 29, Figure 30, Figure 31, and Figure 32], [Harris Deposition page 92, lines 14 through 17]; Harris Deposition page 99, lines 20 through 23; Haberkorn Deposition page 20, lines 2 and 16; Haberkorn email to John Donovan on May 24, 2012, reference "TR 906469" - Haberkorn Deposition Exhibit #5].
11. Once the first-axle-right tire of the trailer struck the guy wire anchor, the anchor was bent forward (toward the showroom/body shop), which caused the top of the pole to move toward the showroom/body shop. When the pole was re-directed toward the showroom/body shop the bottom phase line that crossed the alleyway was lowered. The top right front area of the trailer then caught the now lowered bottom phase line. This secondary contact (top of trailer to bottom phase line) pulled the bottom phase line tight which, in turn, pulled the pole toward the showroom/body shop [Figure 27 and Figure 28], [Harris Deposition page 94, lines 7 through 14; Harris Deposition page 95, lines 14 through 23; Harris Deposition page 95, lines 24 through page 96, line 10; Haberkorn Deposition page 19, lines 23 through page 20, line 8; Haberkorn Deposition page 20, lines 16 through 21].
12. This sequencing caused the pole to strike the showroom/body shop resulting in the subsequent fire.

These opinions are based in part on the investigation conducted thus far and the following foundation.

A photographic inspection (based upon photographs that were taken by Churchwell Fire Consultants on October 31, 2012) of the first-axle trailer tire did not produce any residual evidence marks. The striking of the anchor point (galvanized steel) with a tire would not produce a distinctive transfer mark to a tire. An inspection of the front of the truck revealed

that the front bumper cover was finished in a white paint. If the front bumper would have struck anything, the transfer of material or paint would have been revealed on the bumper [Haberkorn Deposition page 75, line 11].

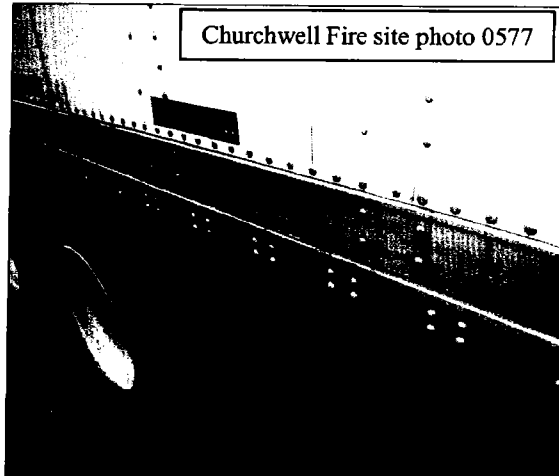


Figure 8



Figure 9

The guy wire anchor displayed a bend located 19 inches from the attachment point (eye). This is consistent with the impact with the tire occurring when the anchor is exposed out of the ground surface approximately 16 to 19 inches.

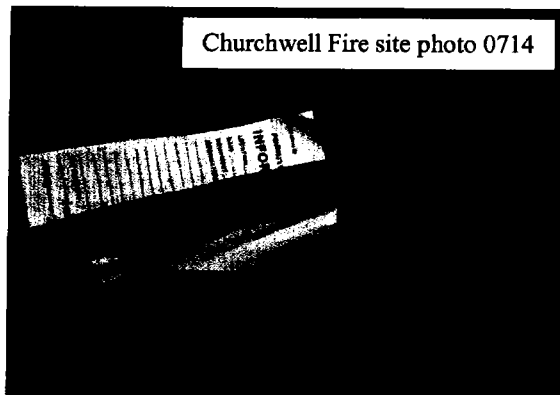


Figure 10

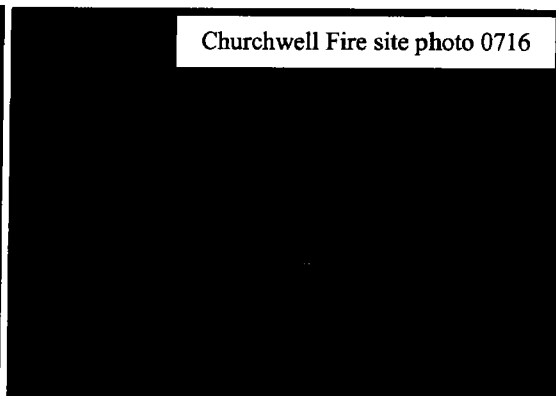


Figure 11

A turning radius and offset testing was conducted using an exemplar tractor and trailer in the actual recorded point cloud data representing the dealership's grounds. Upon conducting

the various turning tests, we are able to provide a visual demonstrative tool used to visualize the dynamics of the off-track turning of the tractor and trailer.

In doing so, we are able to visually demonstrate how this event occurred. The following set of screen shots from the scan data (Figures 12 through 32) represent the various stages of the tractor/trailer as it traverses the rear parking lot up to and including striking the guy wire anchor system.

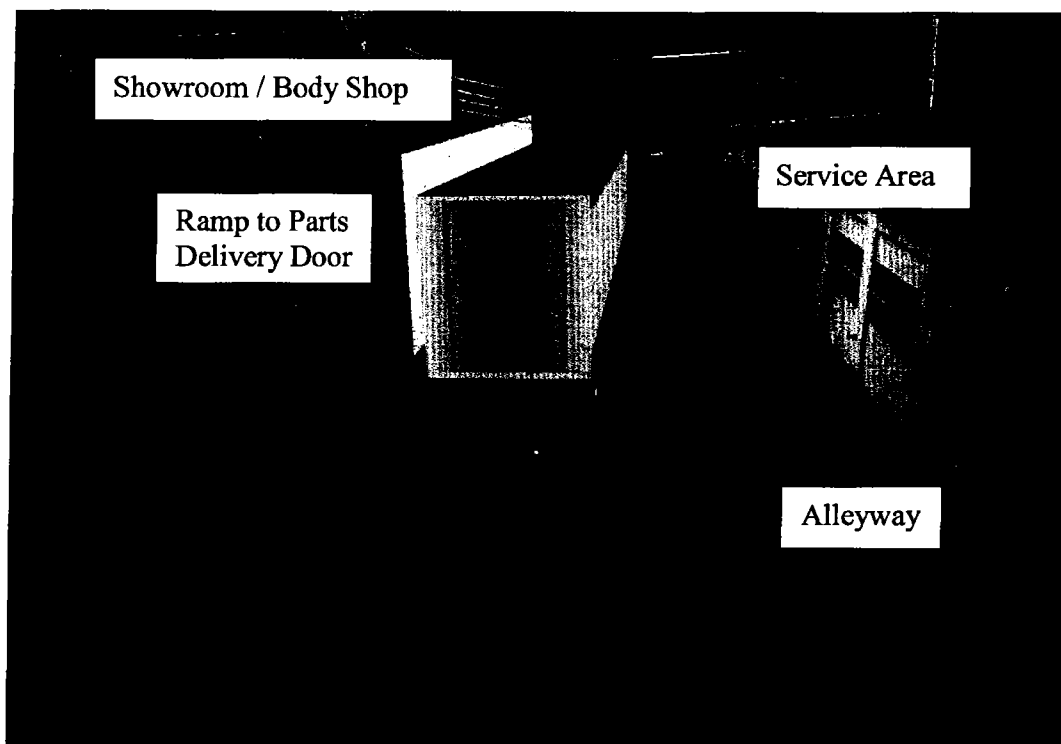


Figure 12
(View of alleyway facing west.)

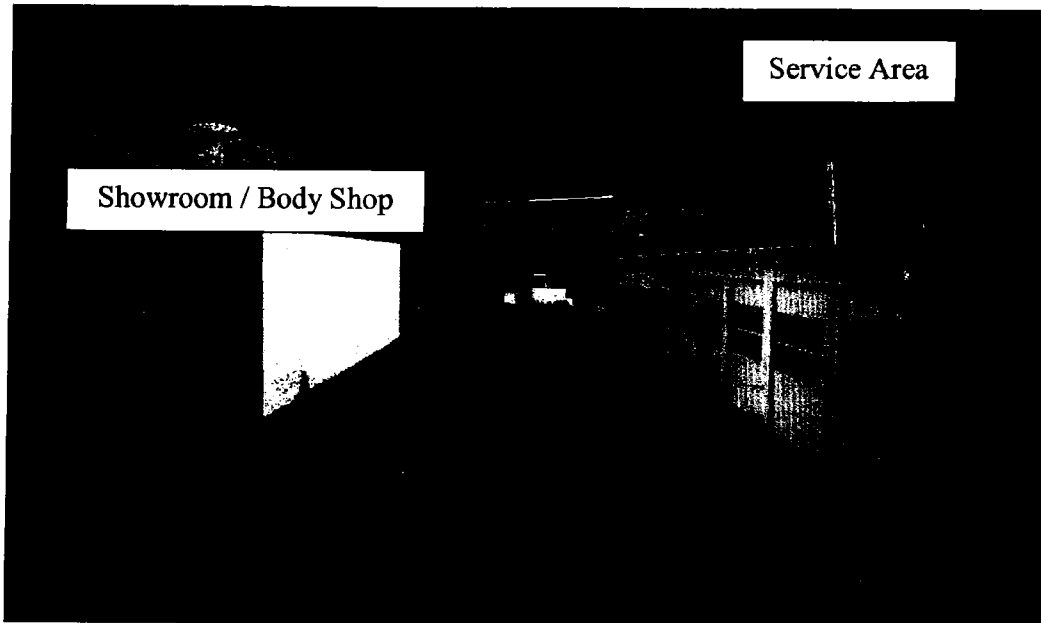


Figure 13

(View of alleyway facing west as the tractor/trailer makes a right turn into the rear parking lot.)

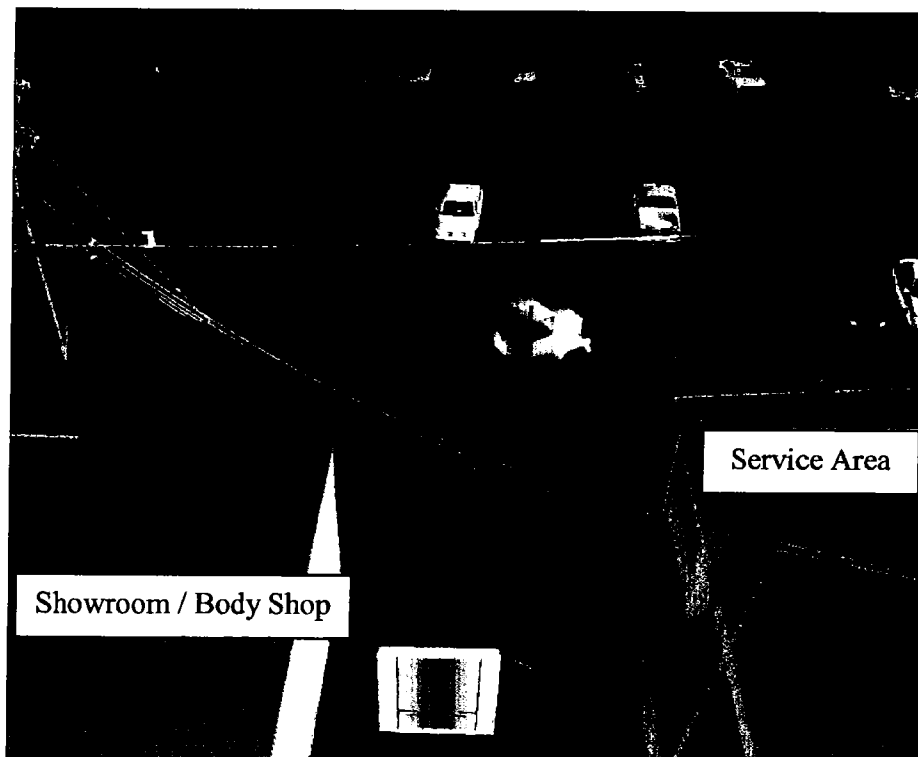


Figure 14

(Elevated view of tractor/trailer as it proceeds to go northbound in the rear parking lot.)

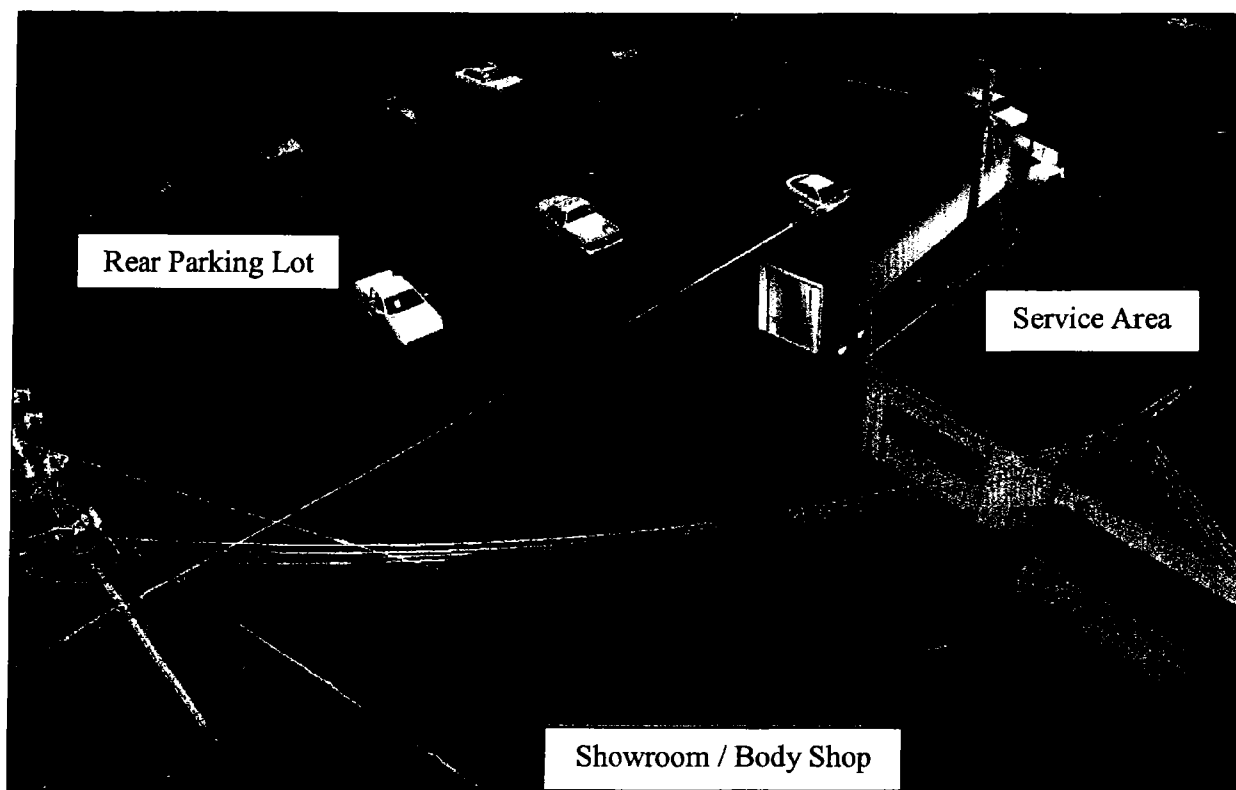


Figure 15

(Elevated view facing northwest, as the tractor/trailer is proceeding north in the parking lot.)

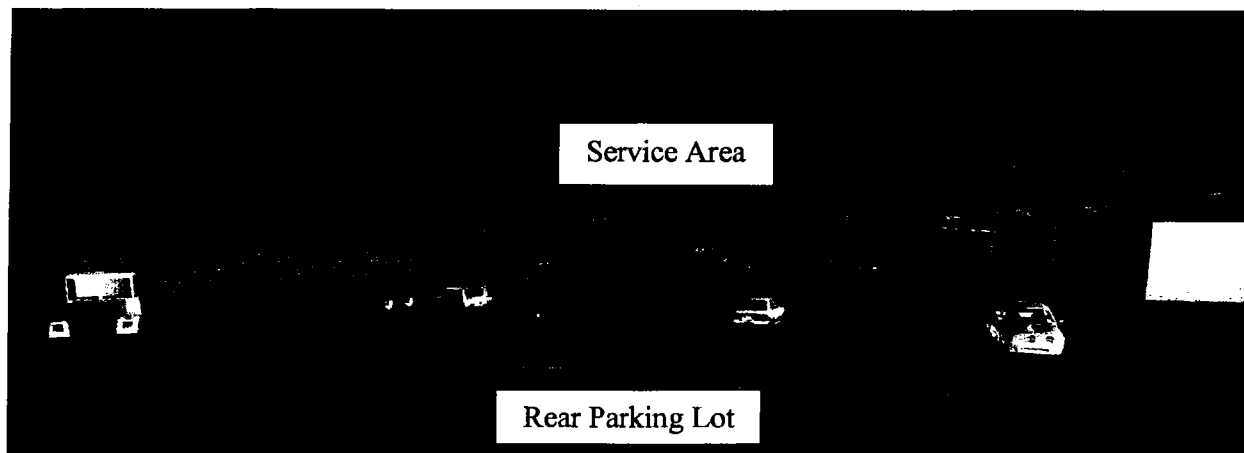


Figure 16

(View from the rear parking lot facing northeast, as the tractor/trailer is turning to proceed to the south end of the lot.)

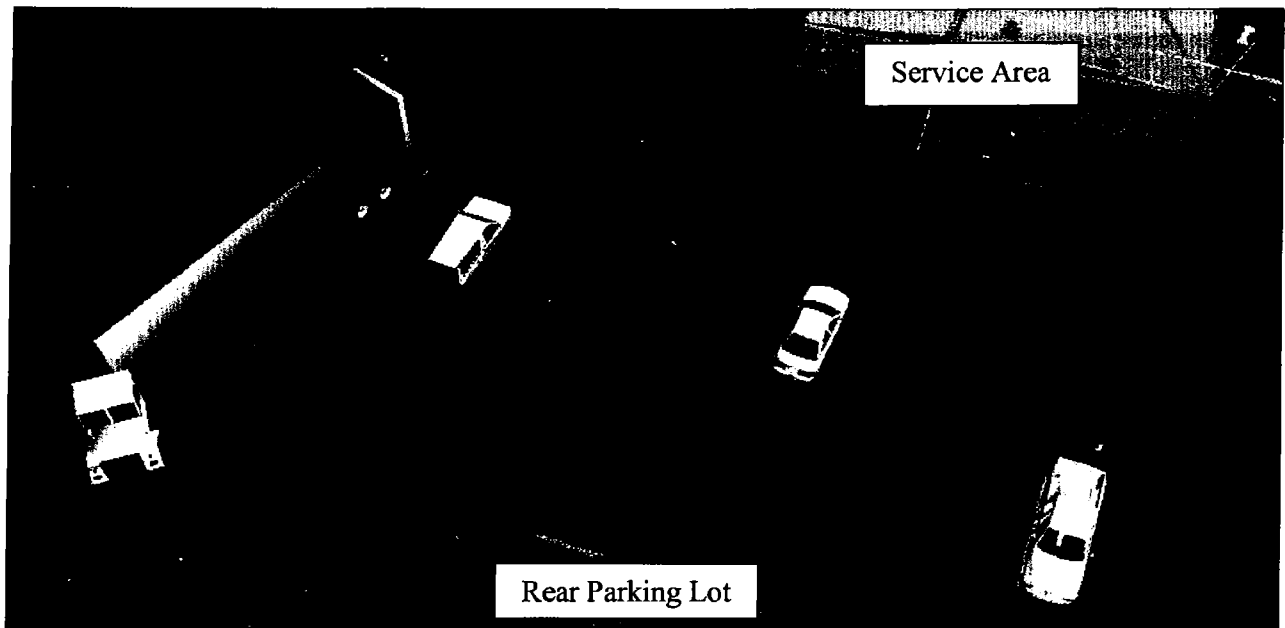


Figure 17

(Elevated view from the rear parking lot facing northeast, as the tractor/trailer is turning to proceed to the south end of the lot.)

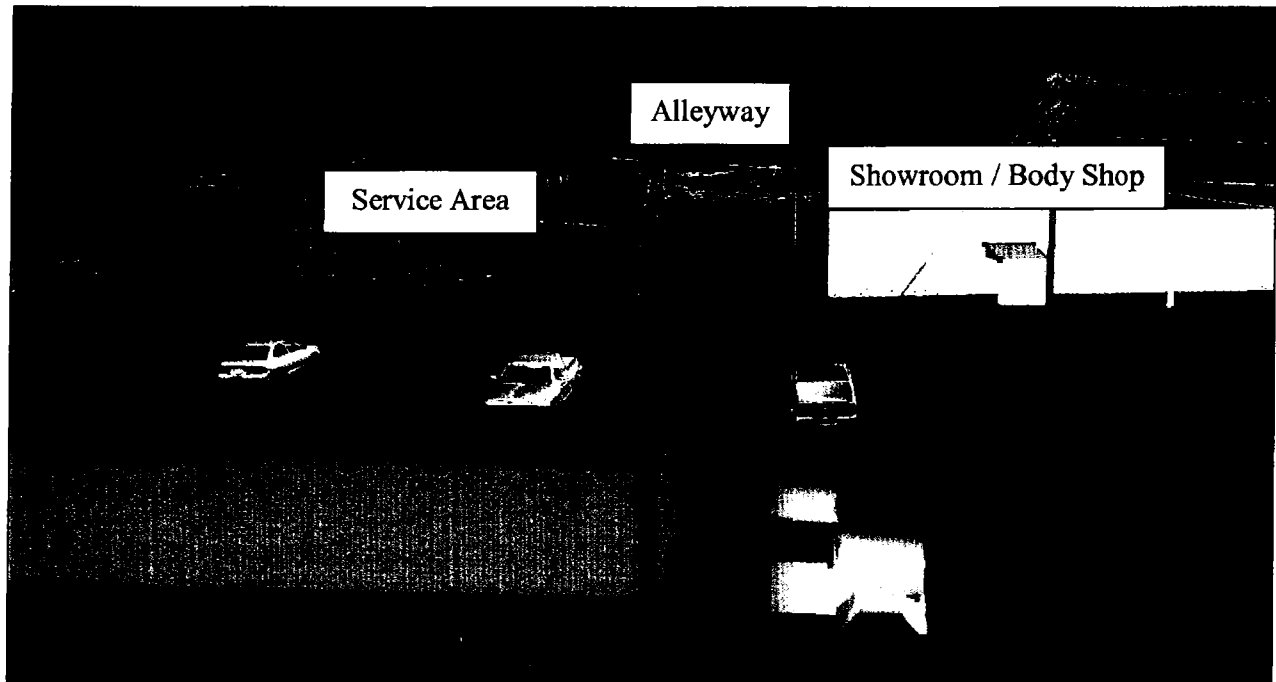


Figure 18

(View from the rear parking lot facing east, as the tractor/trailer is proceeding to the south end of the parking lot.)

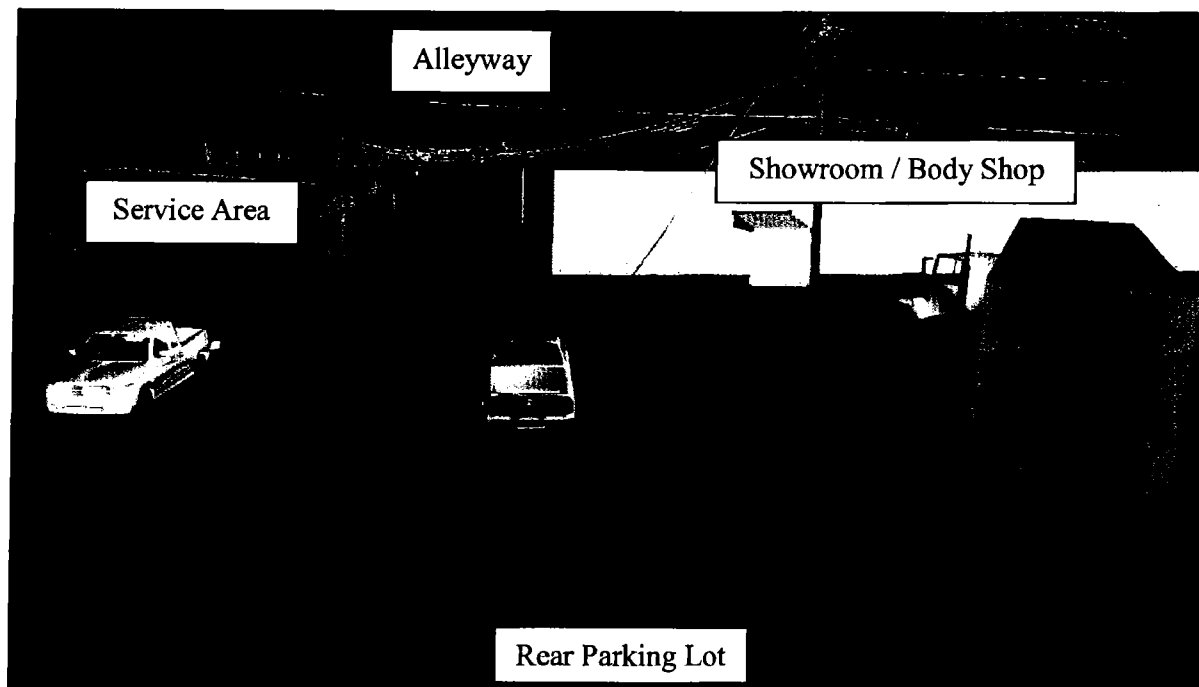


Figure 19

(View from the rear parking lot facing east, as the tractor/trailer is making a left turn to proceed toward the alleyway. At this position, Mr. Harris loses sight of the right side of his trailer).

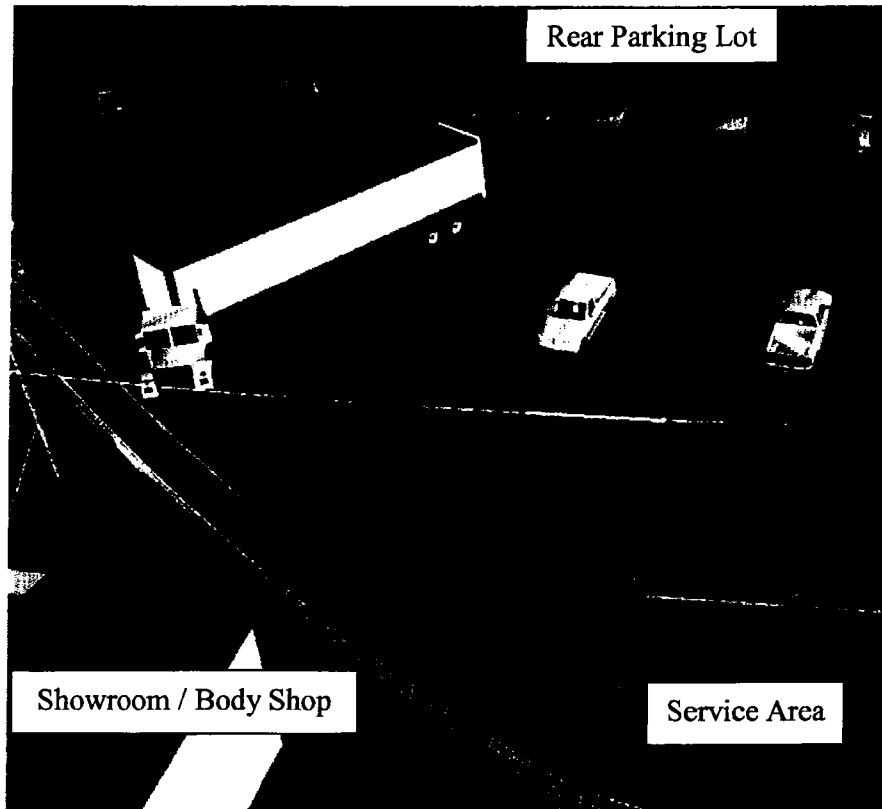


Figure 20

(Elevated view from the rear parking lot facing southwest, as the tractor/trailer is making a left turn to proceed toward the alleyway. At this position, Mr. Harris loses sight of the right side of his trailer).

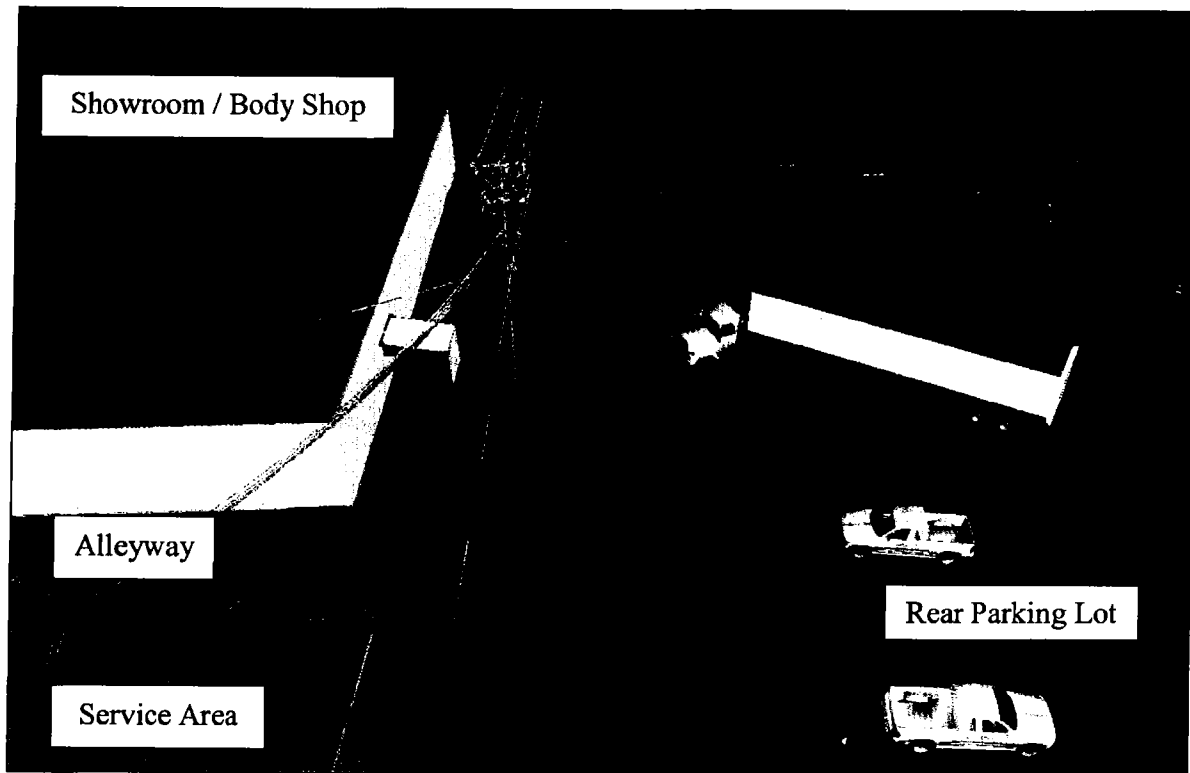


Figure 21

(Elevated view from the rear parking lot, facing south, as the tractor/trailer is making a left turn to proceed toward the alleyway. At this position, Mr. Harris loses sight of the right side of his trailer).



Figure 22

(Elevated viewpoint of the tractor/trailer facing south, attempting to negotiate a turn into the alleyway.)

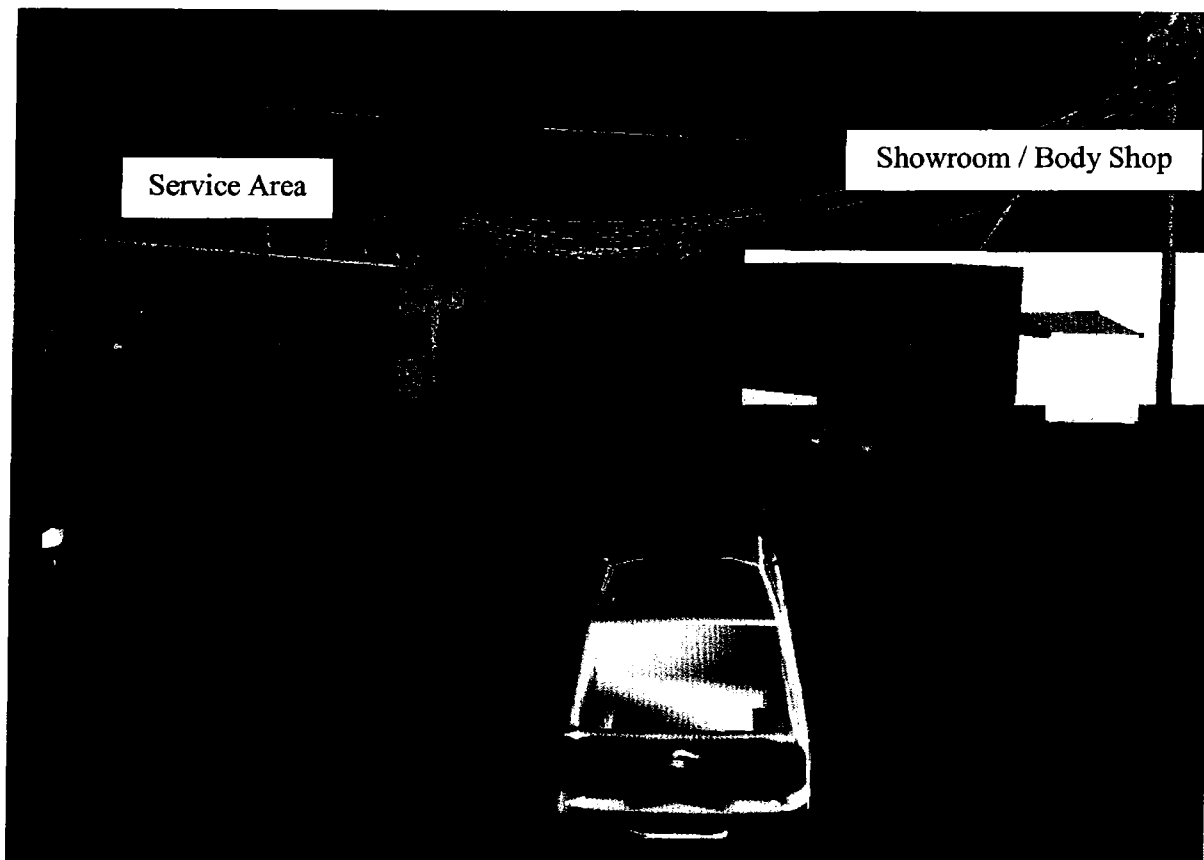


Figure 23

(An easterly view of the tractor/trailer from the rear parking lot, attempting to negotiate a turn into the alleyway.)

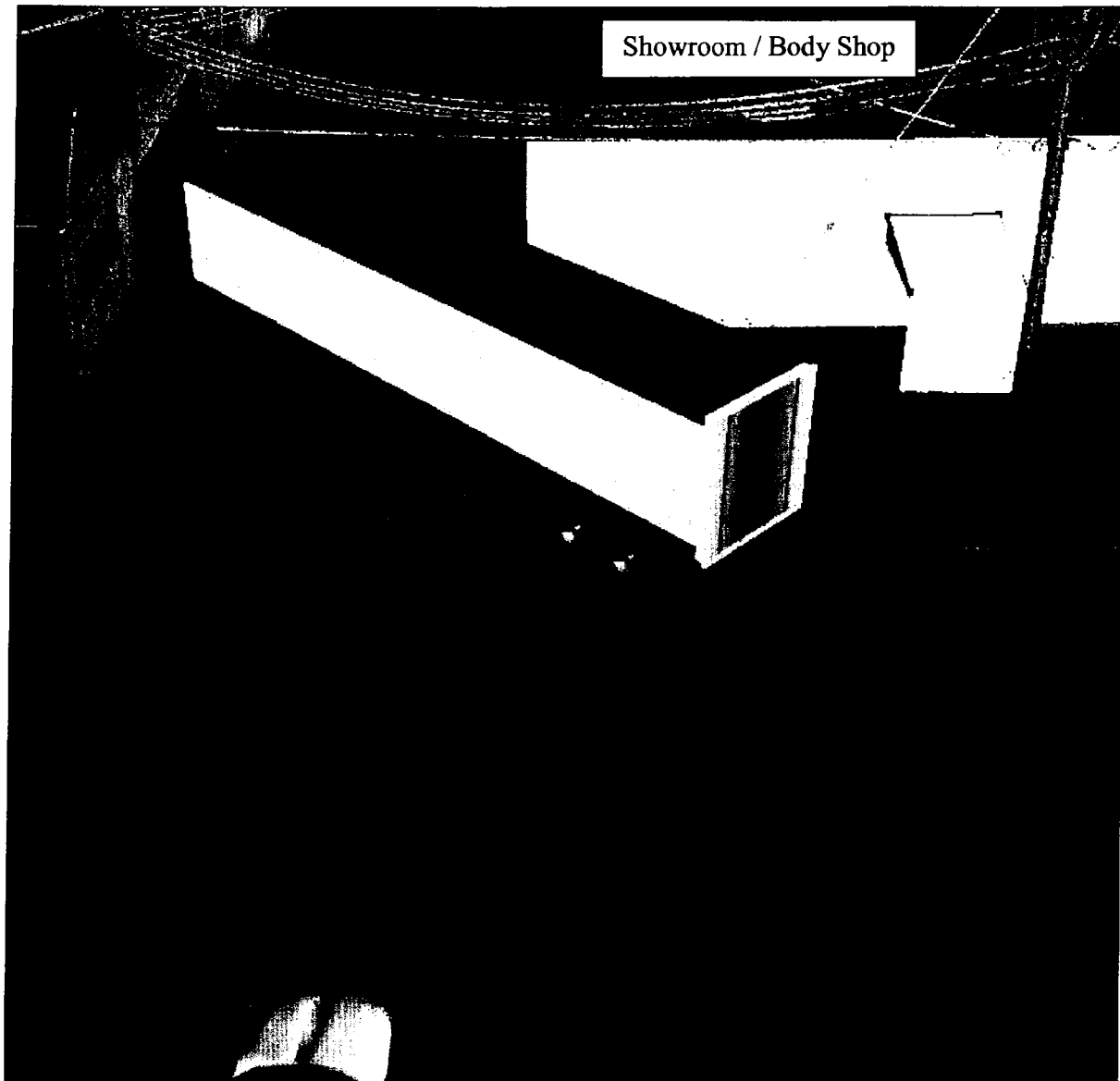


Figure 24

(Elevated view from the rear parking lot, facing east, of the tractor/trailer attempting to negotiate a turn into the alleyway).

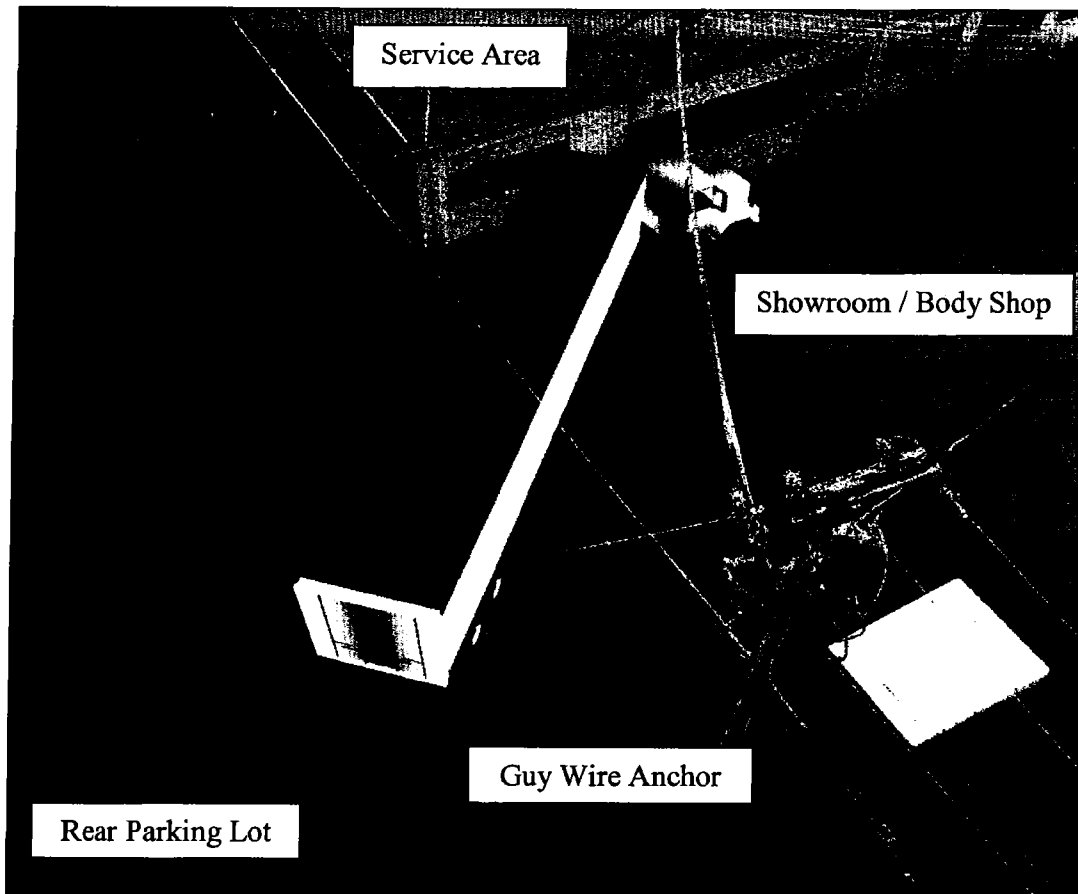


Figure 25

(Elevated view from the rear parking lot, northeast, of the tractor/trailer attempting to negotiate a turn into the alleyway striking the guy wire anchor.)

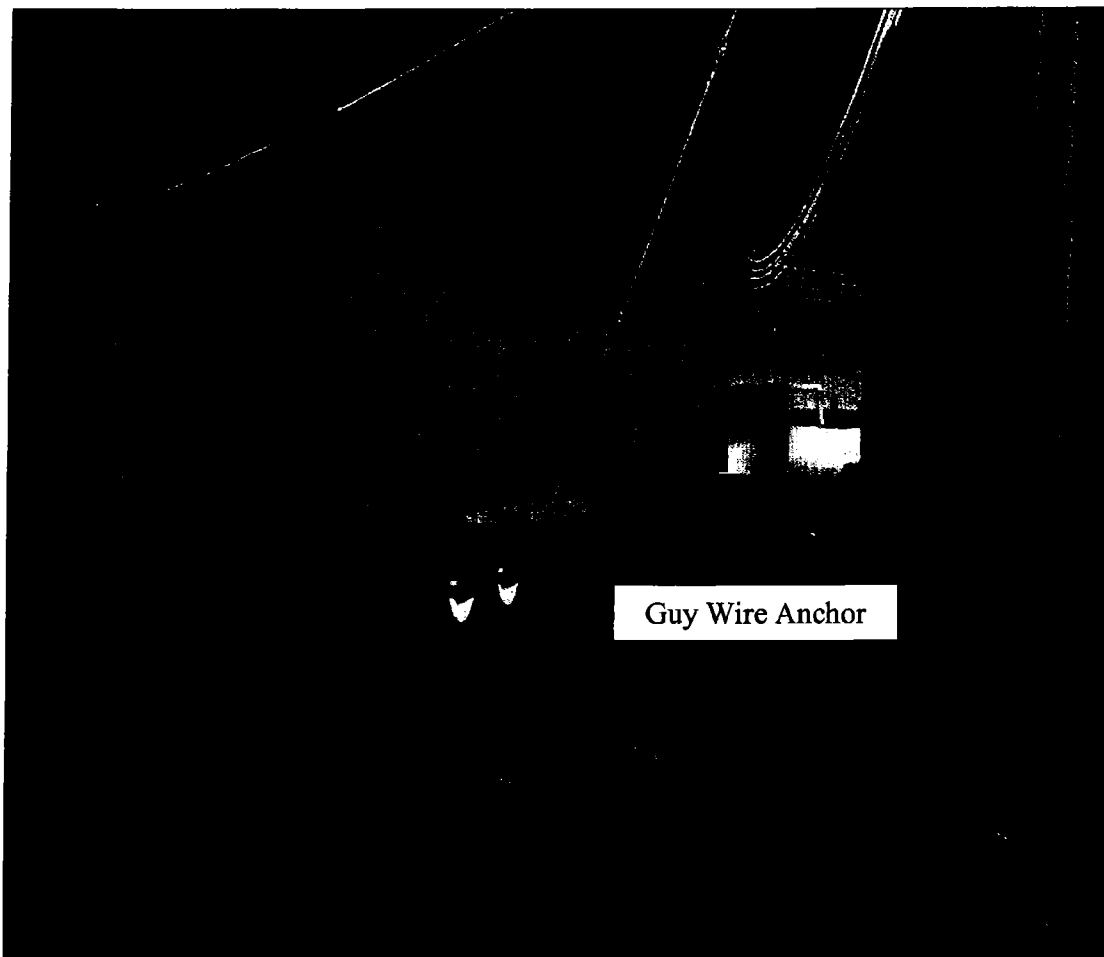


Figure 26

(View of the tractor/trailer from the rear parking lot facing northeast,
attempting to negotiate a turn into the alleyway striking the guy wire anchor.)

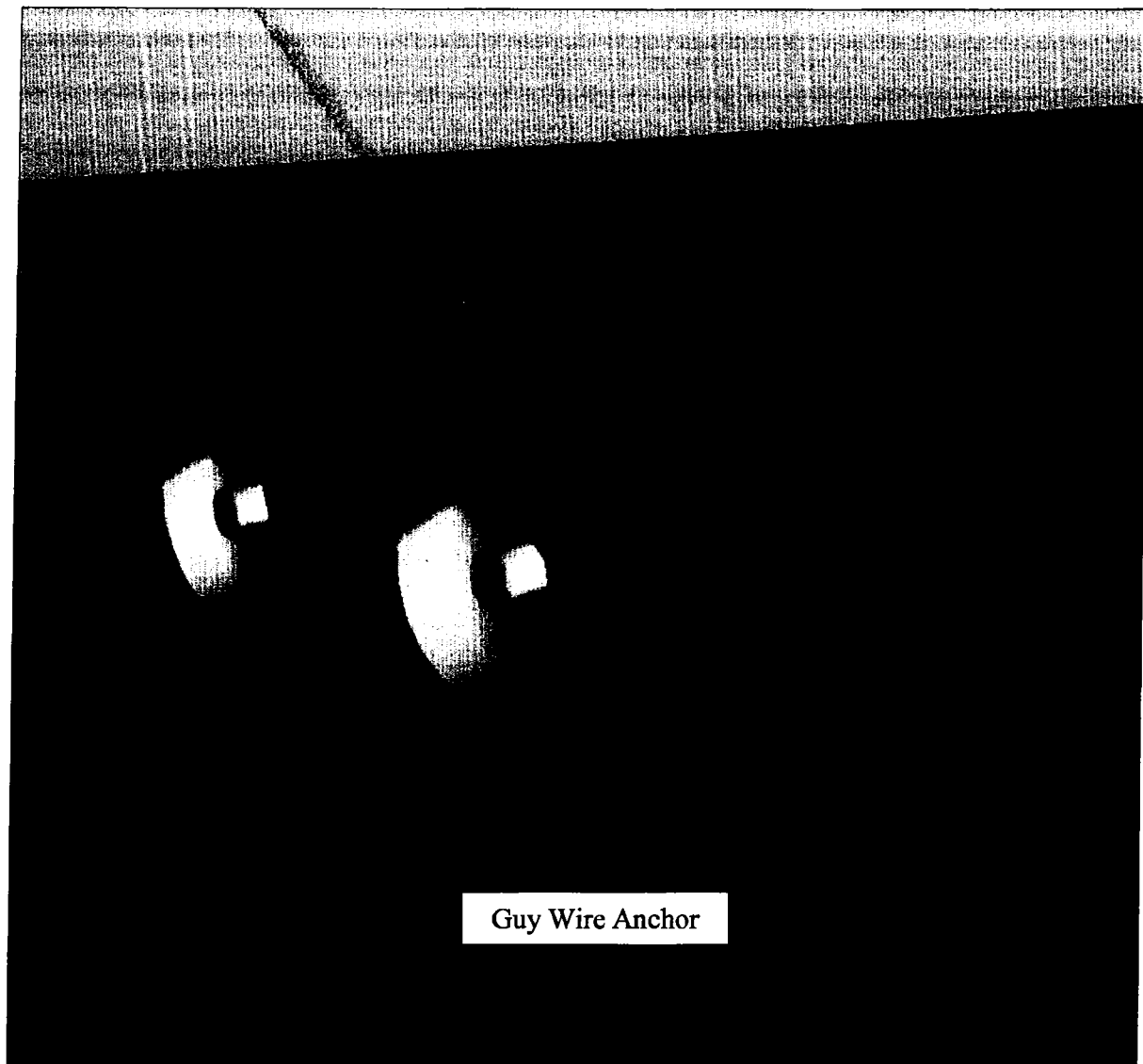


Figure 27

(View of third-axle-right facing northwest, striking the guy wire anchor.)

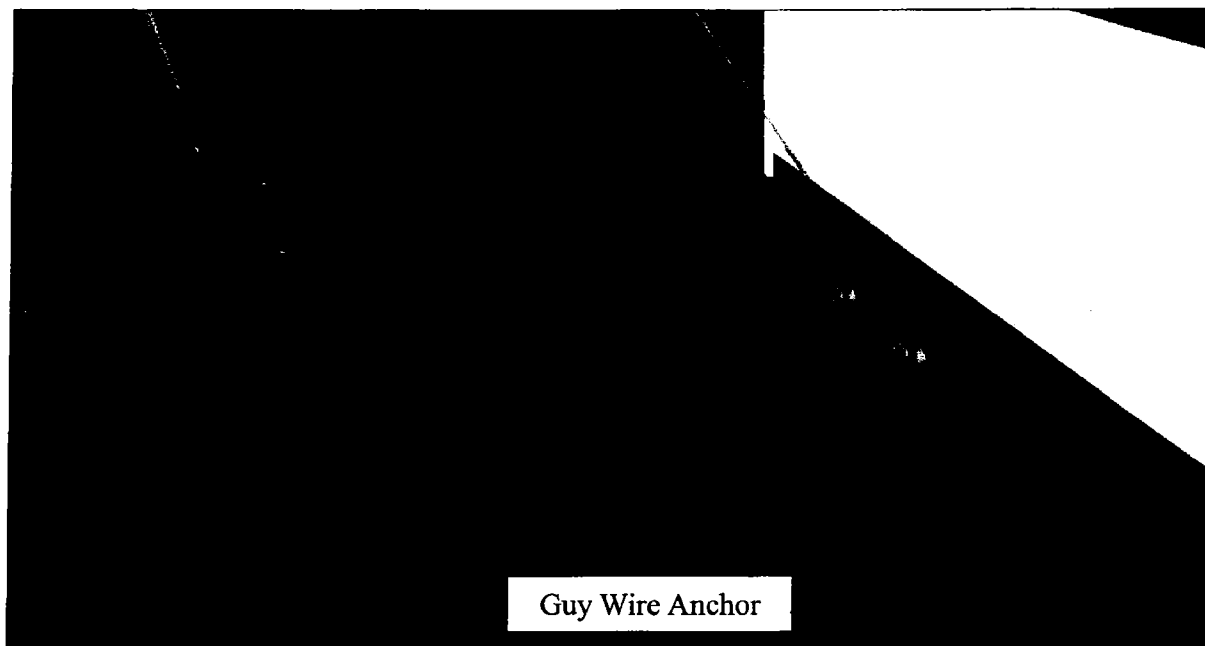


Figure 28

(Elevated view of third-axle-right facing southwest, striking the guy wire anchor.)

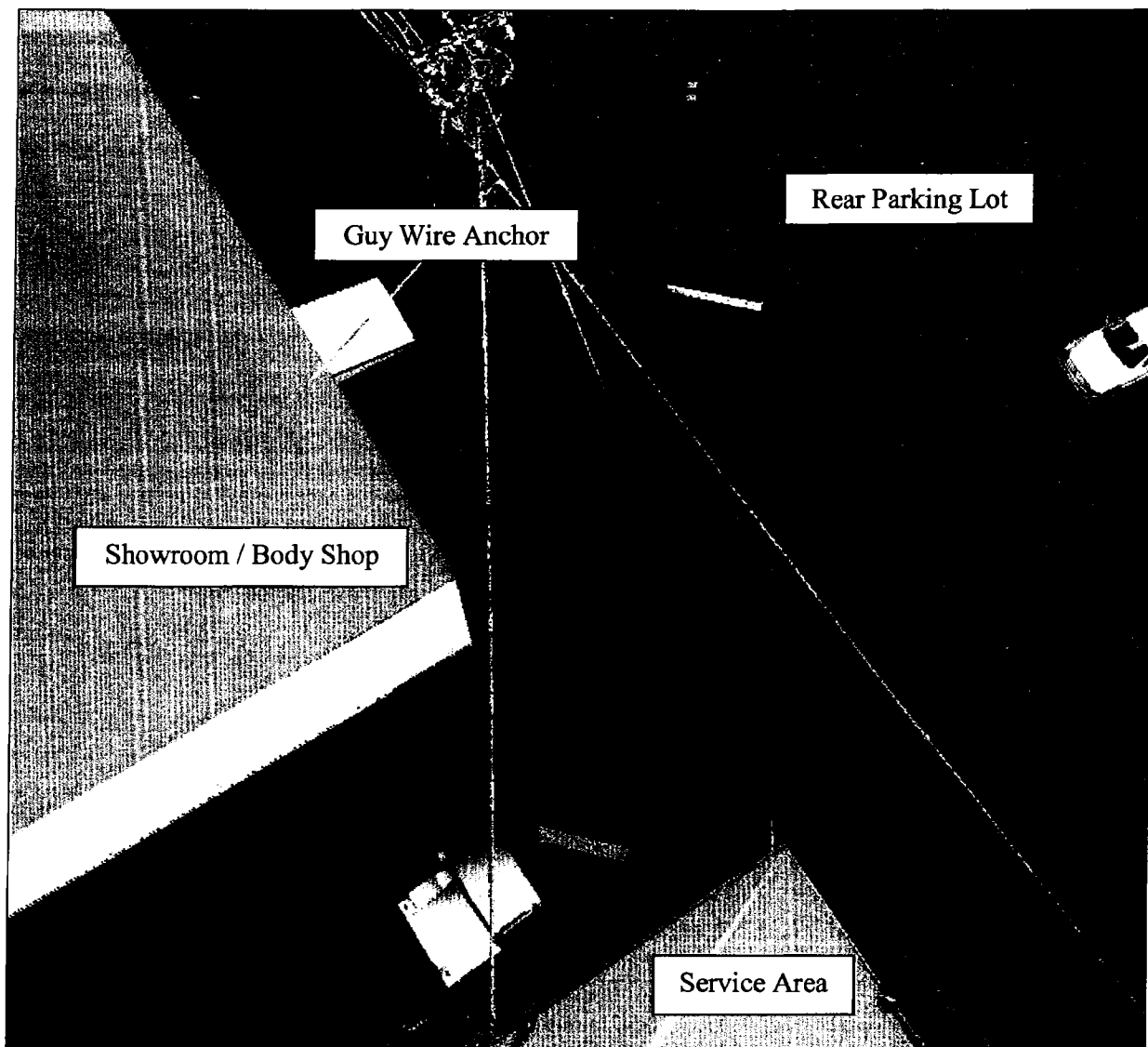


Figure 29

(Bird's eye view of third-axle-right facing southwest, striking the guy wire anchor.)

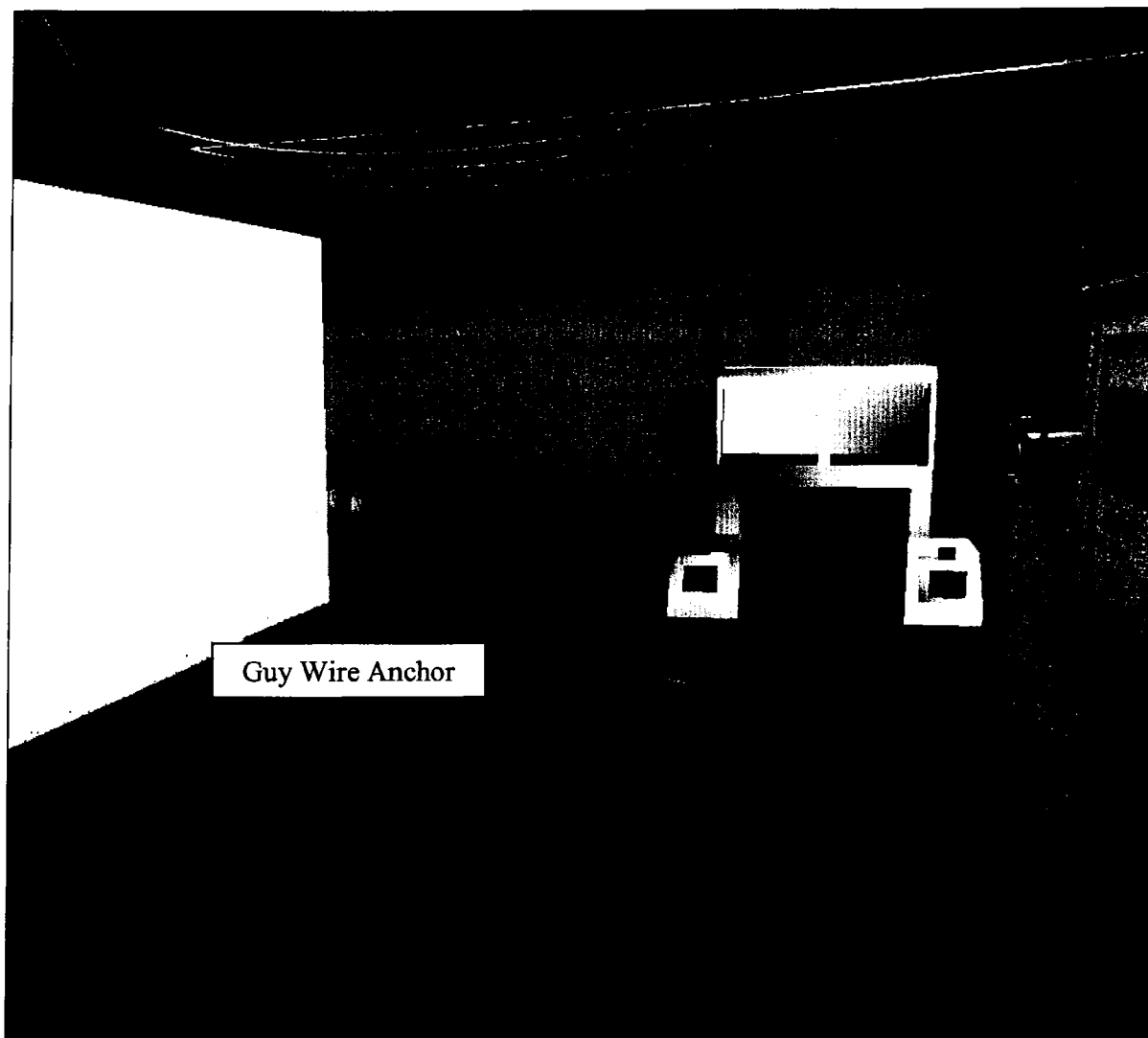


Figure 30

(A westerly view of the tractor/trailer striking the guy wire anchor with its third-axle-right tire.)

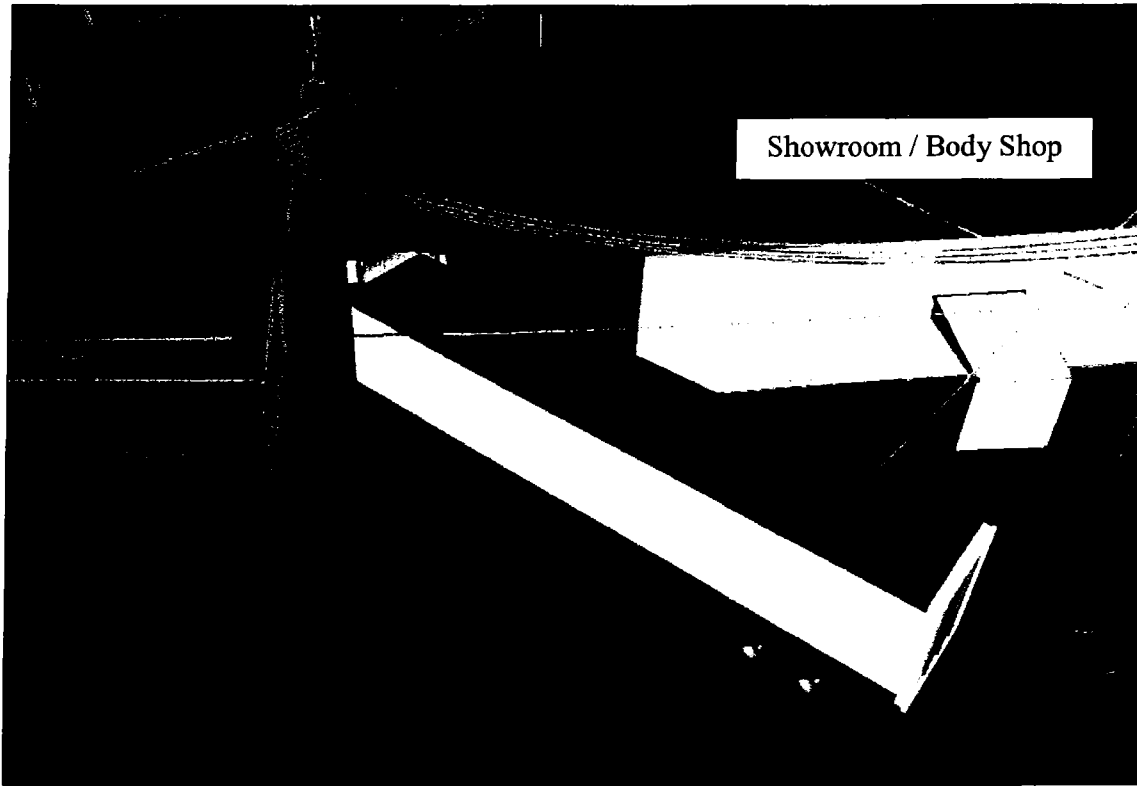


Figure 31

(Elevated easterly view, as the tractor/trailer is negotiating the right turn.)

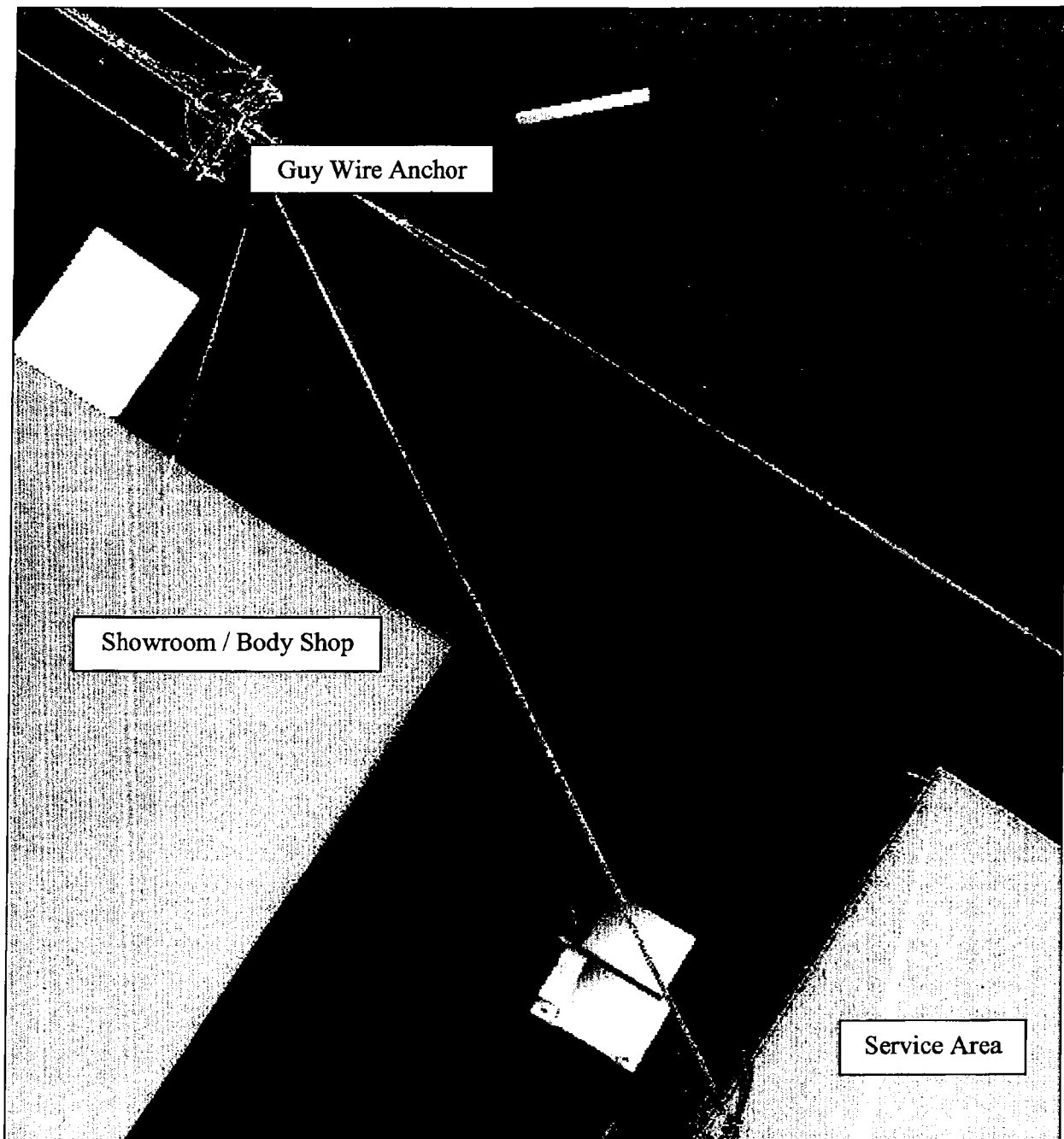


Figure 32

Bird's eye view of the tractor/trailer negotiating the right turn striking the guy wire anchor.)

Conclusion Section – Phase 5.0


Conclusions – Phase 5.1:

TransCon CSI has formed all the opinions stated in this submitted report within a reasonable degree of collision reconstruction certainty within the multiple disciplines of collision reconstruction and HDS 3D laser scanning in which we are both trained and certified to opine.

This event was caused by the striking of the guy wire anchor positioning system by Mr. Harris' trailer tire while attempting to re-enter the alleyway between the showroom/body shop and the service buildings of the King's Chrysler dealership located at 3239 Wilmington Road in New Castle, PA on May 19, 2011. The striking of the anchor positioning system by Mr. Harris' third-axle-right trailer tire caused the guy wire to pull the top of the utility pole toward the showroom/body shop building. Subsequently, this contact also caused the bottom phase (power line) crossing the alleyway to lower, thereby allowing contact with the top right front of Mr. Harris' trailer as he continued in the alleyway. After the initial contact with the guy wire anchoring system, Mr. Harris continued driving forward, causing the guy wire attached to the top of the utility pole to pull forward toward the showroom/body shop building, eventually snapping the pole at its base and causing the resultant fire.

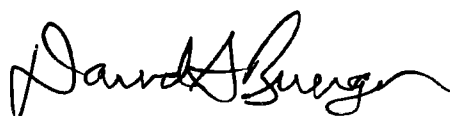
TransCon CSI reserves the right to amend or supplement this report in the event additional information or data are obtained and reviewed.

Respectfully submitted,


Glen F. Reuschling
Accident Reconstruction Expert
ACTAR #1318



Dated: 4/29/13



David A. Buerger
Accident Reconstructionist
3D Laser Scanner Technician

Curriculum Vitae

Glen F. Reuschling

ACTAR #1318

== ***TRANSCON CSI*** ==
CRASH SCENE INVESTIGATIONS

1509 West Street
Annapolis, Maryland 21401

Office: (410) 626-9996

Fax: (410) 626-9997

4/22/2013

1509 West Street
Annapolis, Maryland 21401

TRANSCON CSI
CRASH SCENE INVESTIGATIONS

(410) 626-9996
Fax (410) 626-9997

Glen F. Reuschling
Curriculum Vitae

**ACCREDITED by: The Accreditation Commission For Traffic Accident
Reconstructionist (ACTAR #1318)**

Relevant Skills:

Accepted as an expert witness in court in the following areas:

Speed Calculation Analysis	Highway Work Zone Traffic Incident Management
Manual on Uniform Traffic Control Devices	Vehicle Dynamics and Characteristics
Weight Shift and Rollover Analysis	Time and Distance Computations
Lamp Analysis	Tire Failure Analysis
Braking Performance	Occupant Kinematics

Reconstruction Experience

Teaching Experience

On-Scene Accident Investigation School, Maryland State Police Academy, Pikesville, MD	Advanced Accident Investigation Certification School, Maryland State Police
Certified in Advanced Accident Investigation, Maryland State Police, Pikesville, MD	Traffic Homicide Investigation Certification School, Maryland State Police
Certified in Traffic Homicide Investigation, University of North Florida	Commercial Vehicle Accident Investigation School, University of North Florida / Maryland State Police
Certified in Commercial Vehicle Accident Reconstruction, University of North Florida	Hazardous Materials Awareness Certification School, Maryland State Police
Certified in Tire Forensic and Failure Analysis, University of North Florida	Post Crash Investigation School, Maryland State Police
Occupant Kinematics and Restraining Devices Training School, University of North Florida	Commercial Vehicle Inspector Certification Training, DOT/FHWA, Transportation Safety Institute
Re-Certified in Collision Reconstruction Training, Maryland State Police	Hazardous Materials Inspector Certification Training, DOT/FHWA, Transportation Safety Institute
Certified in Vehicle Damage and Energy Relationship in Collision Reconstruction, Texas A&M University	On-Scene Accident Investigation and Prevention Training, American Trucking Assoc., Training Institute
Certified in Applied Physics for Accident Reconstruction, Texas A&M University	On-Scene Accident Investigation Training, Liberty Mutual Insurance Company RiskTrac™
Certified in Advanced Collision Reconstruction, Arkansas State University	On-Scene Accident Investigation Training, Jefferson Pilot Insurance Company
Certified in Crash Data Retrieval IPTM, University of North Florida	Advanced Collision Investigation Training, Maryland State Police
Certified in Commercial Vehicle Accident Investigation, Maryland State Police	Collision Reconstruction Training, Maryland State Police & MD Reconstruction Committee

Employment History:

1993 to Present: **President - Reuschling Consulting, Inc. t/a TransCon CSI**

- My duties include providing expert testimony in civil and criminal litigation within the multiple disciplines of collision reconstruction for attorneys, insurance companies, and law enforcement agencies. I have personally investigated and handled in excess of 1,000 collision reconstructions resulting in judicial litigation.

1982 to 1993: **Maryland State Police**

- Commercial Vehicle Enforcement Division, Special Operations Staff
 - Duties/Responsibilities:
 - Assistant Training Officer and Post Crash Instructor
 - Accident Reconstructionist
 - Commercial Vehicle Instructor
- Automotive Safety Enforcement Division, Motor Carrier Safety Program
 - Duties/Responsibilities:
 - Commercial Motor Vehicle Inspector
 - Accident Reconstructionist
- Rockville Barrack
 - Duties/Responsibilities:
 - Road Patrol
 - Accident Reconstructionist
 - Advanced Accident Investigator
- Maryland State Police Academy
- Truck Weight Enforcement Division
 - Duties/Responsibilities:
 - Truck Weighing and Inspection

Education:

2002-Present: University of Maryland University College
Management Studies Undergraduate Curriculum

1980-1992 Catonsville Community College, Carroll Community College
Criminal Justice Curriculum

1980-1992 The Community College of Baltimore County
Criminal Justice Curriculum

Awards, Achievements, and Professional Memberships:

- ACTAR Certified (Accreditation Commission For Traffic Accident Reconstructionist) #1318
- Accepted as an expert witness in various District and Circuit Courts of Maryland in the fields of Accident Investigation and Commercial Vehicle Inspections, as well as Virginia, Delaware, Kentucky, New York, Pennsylvania, Washington DC, and West Virginia.
- Appointed as an official consultant for the National Highway Administration, Rollover Program
- Received "The Maryland State Police Superintendent's Commendation Award" for an "Out-Standing Accident Investigation" involving a State Department Official
- Appointed to the State Emergency Response Commission Hazardous Materials Training Committee of Maryland
- Member of the Maryland Motor Truck Association, Safety Council
- Member of the Governor's Motor Carrier Task Force for Safety and Uniformity.
- Accepted as a member of the SAE (Society of Automobile Engineers)
- Accepted as a member of the New York Statewide Traffic Accident Reconstruction Society, Inc.
- Accepted as a member of the National Association of Professional Accident Reconstruction Specialists
- Accepted as a member of the National Safety and Transportation Institute
- Accepted as a member of the International Association of Accident Reconstruction Specialists (IAARS)
- Accepted as a member of the Accident Reconstruction Communications Network (ARC)
- Accepted as a member of the Maryland Association of Traffic Accident Investigators (MATAI)

Appendix A

Listing of Classes and Seminars Attended:

- * 01-13 NTSB Training sponsored by American Bus Association: "NTSB Motorcoach Accident Investigations;" "Media Relations and Accident Related Communications;" "Family Assistance Operations;" Crisis Communications Messaging;" Accident Scenario Workshop." Charlotte, NC.
- * 06-12 "Accident Investigation and Crush Analysis Using Leica Geosystems 3D Laser Scanning Tools"; "HDS for Crash Scene Analysis"; "A Major Crime Lab Director's Perspective on Leica Laser Scanning Tools"; "Presenting Laser Scan Data & Conclusions to Juries, Judges & Attorneys"; "Statewide Deployment of Leica Scan Stations for Criminal Investigations," Hexagon Worldwide User's Group Conference, Las Vegas Motor Speedway, Las Vegas, Nevada.
- * 05-12 Attended FMCSA Motor Carrier Safety Advisory Committee Meeting on *Task 12-02, Suggestions on How To Close Outstanding National Transportation Safety Board (NTSB) Recommendations Classified as "Open-Unacceptable,"* Alexandria, Virginia.
- * 05-12 ITS America 22nd Annual Meeting & Exposition. May 22, 2012 – Emergency Responders Day. Topics included: National Update on Traffic Incident Management, Next Generation 911 Assists First Responders, Work Zones, ITS, and Traffic Incident Management, ITS Tracking Secondary Crashes, Latest Accident Investigation Technologies and Traffic Incident Management Technologies Special Session. National Harbor, Maryland.
- * 02-12 Federal Airbrake Certification – certified by NAVISTAR, USA, Baltimore, Maryland.
- * 01-12 Temporary Traffic Control Managers Course Certification and MUTCD on Uniform Traffic Control Devices certified by the State of Maryland State Highway Administration, Hanover, Maryland.
- * 11-11 Compliance Safety and Accountability Seminar – Motor Carrier compliance review of applicable federal filings, federal and state laws, and financial responsibility requirements established by the US Department of Transportation Federal Motor Carrier Safety Administration. Annapolis, MD.
- * 12-10 Leica Geosystems Forensic Mapping course, specialized training for Leica C10 Scan Station and Leica Cyclone software for determining distances and angles during practical field exercises. Cartography skills for used at traffic highway collisions, crime scenes and other investigations. ACTAR CEUs: 24. Annapolis, MD.
- * 10-10 2010 MdATAI Combined Annual Conference – Commercial Vehicle Conspicuity Systems, Sudden Acceleration, Low Light Forensic Photography, Dynamic Crash Testing (CMV Under-Ride), Human Factors, Vehicle Headlight Systems, Pictometry & New Applications for Imagery, Underride Impact Speed, Heavy Truck Rollover, Energy / Thermodynamics. ACTAR CEUs: 18. Ocean City, MD.

***10-10 Forensic Mapping Class Professional Society of Forensic Mapping – Introduction to the use of electronic measuring devices (Electronic Total Station) in forensic mapping. History, Theory and Collision application. ACTAR CEUs: 6. Ocean City, MD.**

***05-10 ARC/CSI Crash Conference 13 Real World Crash Testing – Light Filaments Forensic Evaluations; Low Speed Crash Analysis; Motorcycle Accident Reconstruction; Commercial Motor Vehicle Forensic Inspection for the Reconstructionist; PDOF and Angle Development Over Time; Impact speed and Post-Collision Speedometer Readings; Accelerometers and Other Devices Used For Skid and Other Testing For the Reconstructionist – Beyond the Drag Sled; Conspicuity Sheeting, Retro Reflective Tape Wear; GPS: The Overlooked EDR?; Using Motion Equations in Accident Reconstruction; OnStar's Automatic Crash Response; Crash Tests Data Review; Speed or Acceleration from Video Frames; CMV Acceleration Study; Commercial Vehicle Testing; Motorcycle/Moped Testing; Low-Speed Crash Testing; Pile-up Testing; and Head-On Collision Testing. Las Vegas, NV.**

***05-10 2010 Defense Litigation Seminar – DeCaro, Doran LLP. Specialized legal defense topics and Updates. The use of the internet (Facebook, Twitter, etc.), Pro Se Litigation, Maryland, Virginia, District of Columbia Updates, Damage Caps & Release Agreements, Experts & Junk Science Redux, Medical Terms and Conditions, Tort Reform, and Forensic Engineering. Greenbelt, MD.**

*** 11-09 (Part II) and 10-09 (Part I) Maryland Motor Truck Association – Safety Management Council Meeting. Presentation on the implementation of Federal Motor Carrier Safety Administration's Comprehensive Safety Analysis 2010 (CSA 2010) program. FMCSA initiative to improve large truck and bus safety and ultimately reduce commercial motor vehicle (CMV)-related crashes, injuries and fatalities. Introduction of a new enforcement and compliance model that allows FMCSA and its State partners to contact a larger number of carriers earlier in order to address safety problems before crashes occur. Training provided by Glenn Kern – Maryland State Police Commercial Motor Vehicle Division, Baltimore, MD.**

*** 10-09 NAPARS Joint Conference – Commercial Motor Vehicle (CMV) Crash Testing and Braking Efficiency Testing. CMV Electronic Data – Electronic Control Module, Newton's Laws with respect to Inertial Reference Frames, CMV Conservation of Momentum, Rotational Forces, Integration of Aerial Photography & Forensic Mapping, Airbrakes, Adjustments and Stopping Ability of CMV, ECM Reports and Hours of Service Compliance, and Software Analysis of ECM Data, Ocean City, MD.**

*** 10-09 Bendix CMV Air Brake Training Seminar, Review of the 121 FMVSS Standard; Air Reservoir Capacity Calculations; Mechanical Brake Lag; Engine Retarders; "Bob-Tail" Proportioning Valve Use; Spring Brake Modulation; Parking Brake Air System; Trailer Brake Air System, ABS System; Brake Adjustment Measurement Techniques; Out-of-Service Requirements; Hands-on Training and Field Testing. Presented by Bendix Spicer Foundation, LLC, Ocean City, MD.**

*** 10-09 Maryland State Police / Maryland Crash Reconstruction Committee – Commercial Vehicle Reconstruction Training. Dynamic testing of vehicle acceleration and braking efficiency. Verification of brake force calculations for speed analysis, Largo, MD.**

*** 06-09 ARC/CSI Crash Conference: Crash Testing, Commercial Vehicle Dynamics Factors in Collision Reconstruction, Car Tires v. Truck Offset Turns, Air Brake Fundamentals & Advanced Technology plus Air**

Brake performance – details from testing, Death Investigations & Their Psychological Effect on Police Officers and Reconstructionists, A Common Sense Approach to Explaining Real World Acceleration Values, Braking Efficiency of Motorcycles, CSF with SUV's in Double Steer Maneuvers, Critical Speed Evaluation, Practical Applications of Accelerometer Data for Accident Reconstructionists, Estimation of Vehicle Speed and Trajectory Based on Video from a Vehicle Mounted Camera, Evaluating a Nightmare response, Optics, Lighting and Visibility for the Forensic Investigator, iWitness Photogrammetry Demo, Human Factors Testing, Crash Data Review and ALM Review of data, Las Vegas, NV.

* 03-09 Developing a Commercial Vehicle Safety Culture Seminar, by Mr. Dennis Shinault, National Safety Council, presented by Maryland Motor Truck Association, Safety Management Council, Linthicum, Maryland.

* 03-09 Bus Safety Summit. Crash Testing, Emergency Evacuation, Bus Safety Program Overview; Fire causes, suppression, retardation, Bus Fire Causation Study; National Motorcoach Safety Program; Industry Association programs; Manufacturer enhancements, technologies; Insurance Company Perspective; Model Commercial Vehicle Safety Plan, presented by the Commercial Vehicle Safety Alliance, FMCSA, DOD, DOT, NHTSA, NTSB, Crystal City, Virginia.

* 10-08 Electronic Control Module (ECM), and Detroit Diesel Diagnostic (DDEC) Link/DDEC Training. Training included both classroom instruction, as well as "hands-on" exercises. Dallas, Texas.

* 10-08 NJAARS (New Jersey Association of Accident Reconstructionists) Annual Joint Conference. Crash Testing; Lateral Pole Impacts; Airborne Testing; Critical Speed; Perception Reaction Times; Crash Data Retrieval (CDR) for Commercial Vehicles & Buses; Alcohol, Cannabis, Cocaine and Driving; CDR Updates; and CAD Zone Overview. Atlantic City, New Jersey.

* 05-08 CDR Technician Certification. This course offers the collision investigator insight into the fundamental operational function of the Bosch Crash Data Retrieval (CDR) System. The overall operation of the CDR System to include evaluation of the vehicle being examined for download and application of and troubleshooting of the software and hardware for GM, Ford and Chrysler vehicles, as well as access considerations for the PCM, ACM and ROS.

* 05-08 CDR Data Analyst Certification Course presented by Collision Safety Institute, Millersville, Maryland. General legal considerations (criminal and civil) related to CDR data admissibility; Types of data collected; Understanding, identifying and dealing with anomalous data from GM, Ford and Chrysler vehicle CDR reports.

* 03-08 Temporary Traffic Control Traffic Manager Training Certification Course – Certified by The Maryland State Highway Administration, Hanover, Maryland.

* 11-07 Department of Transportation Drug and Alcohol Testing Seminar: Including pre-employment testing, previous employer inquiries, and proposed regulatory changes, by Mr. Mark Snider, Senior Policy Advisor, Acting Deputy Director (Administration), Office of Drug and Alcohol Compliance, U. S. Department of Transportation presented by Maryland Motor Truck Association, Safety Management Council, Linthicum, Maryland.

- * **10-07** NYSTARS (New York State Accident Reconstruction Specialists) Annual Joint Conference. Investigating Eccentric Collisions, Crash Testing by the Collision Safety Institute (CSI), Occupant Kinematics in Rotational Collisions, Investigating Collisions at Signalized Intersections, Injury Patterns and Mechanics of Injury, Crash Data Retrieval Update, Crash Testing Review and Analysis, Binghamton, New York.
- * **09-07** Federal Motor Carrier Safety Instruction, DOT Audits, by Bernard McWay, Division Program Specialist, FMCSA, DOT, presented by the Maryland Motor Truck Association, Safety Management Council, Linthicum, Maryland.
- * **09-07** Maryland State Police Commercial Vehicle Accident Reconstruction School, Truck Inspection/Dynamic Testing, Hanover, Maryland
- * **06-07** ARC/CSI Conference Crash Testing, Hit and Run Investigation, Smart Drive System Crash Data, Investigating Snowmobile Crashes, Seat Belt Effectiveness and Injury Correlation, Mechanism of Air Bag Injuries, Traffic Reconstruction at Traffic Signal Intersections, European Reconstruction Techniques, Human Factors Beyond Perception Reaction Time, Investigating Nighttime Pedestrian Collisions, Momentum Analysis Workshop, Complex Analysis Workshop, Reprogrammed Powertrain Control Modules and Crash Analysis, Crash Test Analysis: Solutions and Review, Angular Velocity Analysis of SUV Collisions, The Effects of Sample Rates and Averaging Methods on Accelerometer Based Skid Testing in Accident Reconstruction, Review of Low Speed Crash Tests and the Effect of Restitution, Las Vegas, NV.
- * **05-07** Manual on Uniform Traffic Control Devices Recertification, and Certification of the Maryland Manual on Uniform Traffic Control Devices (Temporary Traffic Control), presented by the United Transportation Training, Inc., Ocean City, Maryland.
- * **01-07** Crash Data Retrieval System User's Course, presented by Vetronix Corporation, Houston, Texas.
- * **09-06** Trucking Litigation and DOT Regulations in Maryland Seminar - Litigating a Truck Claim from Accident Scene to Courtroom, DOT Compliance and Audits, presented by Lorman Education Services, Baltimore, Maryland.
- * **02-06** Temporary Traffic Control Traffic Manager Training Certification Course – Certified by The Maryland State Highway Administration, Hanover, Maryland.
- * **10-05** Federal Motor Carrier Safety Instruction, conducted by the Office of Motor Carrier, Federal Highway Administration, Baltimore, MD.
- * **10-05** Comprehensive Computer Animated Drawing training, provided by CadZone, Wilmington, DE.
- * **10-05** Review of Curve Collisions, Review of the Manual on Traffic Control Devices, Intersection Sight Distance Evaluations, Highway Sight Distance Evaluations, Roadway Design Safety, Concrete Barriers Design Instruction, Pavement Design and Coefficient of Friction, Recommended Procedures for Safety Performance Evaluations (NCHRP Report 350), Railroad Crossings Evaluation - NATARI 2005 Combined Annual Conference on Accident Investigation and Reconstruction, Wilmington, DE.

- * **06-05** Crash Testing and Skid Testing involving Commercial Vehicles, Pedestrians, and Car-to-Car; Pedestrian Crash Reconstruction; Pedestrian Crash Injury and Analysis; Evaluation of Damage and Energy in Crashes; Influence of Visibility on Driver Response, Air Bag Deployment and Development, Child Safety Seat Issues in Crash Reconstruction, Crash Data Retrieval System Developments – ARC/CSI Conference, Las Vegas, NV.
- * **06-05** Crash Data Retrieval System Operator's Certification Course Update 2005 – Collision Safety Institute, Las Vegas, NV.
- * **09-04** Criminal Litigation in Accident Reconstruction, DNA in Accident Reconstruction, Excel and Spreadsheets for Accident Reconstruction, Electronic Crash Data Recorders – Update, NHTSA Early Warning Reporting Regulations – MATAI Joint Conference, Ocean City, MD.
- * **04-04** Motorcycle Collision Investigation, Crush Analysis in Vehicle Reconstruction, Left Turn and Gap Acceptance Crashes, Commercial and School Bus Collision Reconstruction, Human Factors in Vehicle Collision Reconstruction, Work Zone Accidents, Truth Analysis: Assessment of Written Statements, Occupant Injuries in Reconstruction Cases, – Institute for Law Enforcement Education, Champion, PA.
- * **11-03** Crash Data Retrieval User Certification Course – Certified by Institute of Police Technology and Management, University of North Florida, Jacksonville, FL.
- * **10-03** NJAARS Joint Conference Class – Crash Testing, Atlantic City, NJ.
- * **03-03** Temporary Traffic Control Traffic Manager Training Course – Certified by The Maryland State Highway Administration, Hanover, Maryland.
- * **09-02** ACTAR (Accreditation Commission For Traffic Accident Reconstructionist) Certification Testing, Ocean City, MD.
- * **09-02** Introduction to Event Recorders and Crush Documentation and Analysis Seminar, Ocean City, MD.
- * **12-01** Manual On Uniform Traffic Control Devices Recertification Training 2000, Maryland Transportation Technology Transfer Center, College Park, Maryland.
- * **10-01** Collision Reconstruction Re-Certification School, Maryland State Police, Pikesville, Maryland.
- * **11-99** Vehicle Damage and Energy Relationship in Collision Reconstruction School, given by The University of Texas A&M, Dickerson, MD.
- * **10-99** Collision Reconstruction Seminar, given by The National Association of Traffic Accident Reconstructionist and Investigators, Inc. (NATARI), Allentown, PA.
- * **07-99** Accident Reconstruction Seminar, given by The International Association of Accident Reconstruction Specialists (IAARS), Charleston, SC.

- * 10-98 Advanced Motorcycle Accident Reconstruction & Testing Course, given by The National Association of Traffic Accident Reconstructionist and Investigators, Inc., Waldorf, MD.
- * 01-98 Advanced Collision Reconstruction Course, given by The University of Texas A & M, Dickerson, MD.
- * 10-97 Low Speed Crash Analysis and Forensic Tire Examination, given by The New Jersey Association of Accident Reconstructionist, Atlantic City, NJ.
- * 10-97 Brake System Design & Application Methods Course - Air Brake Systems Friction Material Brake Parts & Spring Brakes, given by Ferodo America, Nashville, TN.
- * 06-96 Commercial Vehicle Accident Investigation and Reconstruction Certification School, given by The Arkansas State University, Jonesboro, AR.
- * 11-95 Managing Human Fatigue in Transportation, given by NASA and The National Traffic Safety Board (NTSB), Tysons Corner, VA.
- * 10-95 Human Factors in Accident Reconstruction, given by The National Association of Traffic Accident Reconstructionist and Investigators, Inc., 1995 Joint Conference, Lancaster, PA.
- * 09-95 Applied Physics for Accident Reconstruction Course, given by Texas Engineering Extension Service, The Texas A&M University System, Criminal Justice Academy, Baltimore, MD.
- * 05-94 Bendix Brake School and Testing, given by The Bendix Corporation, Midway, PA.
- * 01-94 Commercial Vehicle Accident Reconstruction Certification Training, given by The Maryland State Police, Pikesville, MD.
- * 10-93 Air Brake, Inspection and Adjustment Certification Training given by The Bendix Corporation, Linthicum, MD.
- * 12-91 North American Driver/Vehicle Instructor Development Certification Course, given by USDOT Federal Highway Administration Transportation Safety Institute, Oklahoma City, OK.
- * 06-91 Occupant Kinematics and Investigation of Occupant Protection Devices Training Course given by The Institute of Police Technology and Management, The University of North Florida, Westminister, MD.
- * 09-90 Contemporary Topics in Accident Reconstruction Course, given by The Institute of Police Technology and Management (IPTM), The University of North Florida, Westminister, MD.
- * 08-90 North American Driver/Vehicle Instructor Development Certification Course given by USDOT Federal Highway Administration Transportation Safety Institute, Oklahoma City, OK.
- * 07-90 Air Brake Maintenance and Heavy Truck Accident Training, given by Dynamic Science, Inc., Baltimore, MD.

- * 03-90 Accident Analysis - The Road and the Vehicle Training Course, given by The National Association of Traffic Accident Reconstructionists and Investigators, Philadelphia, PA.
- * 02-90 Tire Forensics For the Accident Investigator School, given by The Institute of Police Technology and Management, University of North Florida, Media, PA.
- * 01-90 Traffic Homicide Investigation Certification School, given by the Maryland State Police, Pikesville, MD.
- * 10-89 Power Steering Components Training, given by USDOT, Hebbsville, MD.
- * 09-89 Commercial Vehicle Accident Certification School, given by The Institute of Police Technology and Management, University of North Florida, Pikesville, MD.
- * 05-89 Coupling Devices Training, given by United Parcel Service (UPS), Burtonsville, MD.
- * 04-89 Steering and Brake Systems Training, given by Mack Truck, Inc., Allentown, PA.
- * 02-89 Air Disc Brake Training, given by The Exxon Corporation, Baltimore, MD.
- * 01-89 Air Brake and Axle Assembly Training, Baltimore, MD.
- * 01-88 State of Maryland Motor Carrier Safety Training Program, given by the Maryland State Police, Brooklyn Park, MD.
- * 12-87 Commercial Motor Vehicle Enforcement, given by the Maryland State Police, Pikesville, MD.
- * 11-87 Uniform Driver – Vehicle Inspection, given by the Maryland State Police, Pikesville, MD.
- * 03-87 Traffic Homicide (Reconstruction) Investigation Certification, given by The Maryland State Police, Baltimore, MD.
- * 06-84 Advanced Accident Investigation Certification School, given by The Maryland State Police, Pikesville, MD.
- * 06-83 Accident Investigation Techniques Training, given by The Maryland State Police, Pikesville, MD.
- * 06-83 Commercial Vehicle Enforcement Training, given by The Maryland State Police, Pikesville, MD.

TRANSCON CSI

Glen Reuschling, Expert
Depositions & Trials
Case List, as of March 15, 2013

Transcon File #	Case Name Case #	County/State	Deposition or Trial	Hired By:	Defendant /Plaintiff
06-052	Kristen Anderson v. Greyhound Lines, Inc. and The Goodyear Rubber and Tire Company US Dist. Ct. #06CIV.13371	New York	Deposition	Kevin Pollak, Esq. New York, NY	D
08-001	Pegues v. Greyhound Lines, Inc 09 CVS 4348	Henderson, NC	Deposition	Brian Beverly, Esq. Raleigh, North Carolina	D
08-006	Lewis v. Greyhound Lines, Inc. 2007-56969	Houston, TX	Deposition	Chris King, Esq. Houston, TX	D
08-014	Gray v. Chavez CAL 08-09713	Prince George's Co., MD	Deposition & Trial	Dana Paul, Esq. Baltimore, MD	P
08-041	Jackson v. Williams Cal09-05297	P.G. Co., MD	Deposition	Vail Kaufman, Esq. Greenbelt, MD	P
09-004	Johnson v. Hip Hot in Place Paving 004145	Philadelphia, PA	Deposition	Chris Mavros, Esq. Philadelphia, PA	P
09-006	Saravia, et al. v. New Century Travel, Inc. et al. 8:10CV0832	US Dist Court – MD Southern District	Deposition	Warren Stephens, Esq. Bowie, MD	D

09-017	Whitaker v. Allied Building 09L003301	Queen Anne Co., MD	Deposition	Warren Stephens, Esq. Bowie, MD	D
09-044	Harris v. Richardson 06-C-09053022	Carroll Co., MD	Deposition	Austin Brizendine, Esq. Baltimore, MD	P
09-050	Wroblewski v. OfficeMax, North America, et al. 06-C-11-059930	Carroll Co., MD	Deposition	Clifford Silbiger, Esq.	P
09-055	Green v. WMATA 2009 CA 003474 B	Washington, DC	Deposition	Steven Vinick, Esq. Greenbelt, MD	P
09-072	Aguirre v. Temp. Distribution of MD 2011-00305	Fairfax, VA	Deposition	Brandon Gladstone, Esq. Springfield, VA	P
09-076	Baibakis v. Commer Construction 12-C-09-3495	Cecil Co, MD	Deposition & Trial	Richard Oare, Esq. York, PA	P
10-002	Shorter v. Domino's Pizza, LLC, et al. WMN 09CV 2190	Hartford Co., MD	Deposition	Thomas Farrington, Esq. Silver Spring, MD	P
10-011	Carnes v. Moorman 06-C-08-050748	Carroll Co., MD	Deposition	William Finch, Jr., Esq Westminster, MD	P
10-012	Campos v. GLI-Americanos, Texas 2010-03-001717-C	Texas	Deposition	Tamara Rodriguez, Esq. Edinburg, TX	D
10-068	DeLong v. URS	King George Co., VA	Trial	Eric Nyce, Esq. Bowie, MD	D
11-007	Huynh v. Banules CL2011-00748	Circuit Court of Fairfax Co., VA	Deposition	Michael Strong, Esq. Fairfax, VA	P

11-012	Paul v. Stokes 17-C-11-016201	Circuit Court of Queen Anne's Co., MD	Deposition	Sam Paavola, Esq. Annapolis, MD	P
11-022	Jelbaoui, Melinda	District of Columbia Washington, DC	Deposition	David Lamb, Esq. Washington, DC	P
12-017	Donadio v. Ikeda	District of Columbia Washington, DC	Deposition	James Liskow, Esq. Bowie, MD	P
12-018	Cook v. GEICO CAL11-03420	Circuit Court of Prince George's Co., MD	Deposition & Trial	Dana Paul, Esq. Edgewater, MD	P
12-060	Collins v. Deol 12C12000286	Circuit Court of Harford County, MD	Deposition & Trial	Patrick Blake Norfolk, VA	D

1509 West Street
Annapolis, Maryland 21401

== TRANSCON CSI ==

CRASH SCENE INVESTIGATIONS
Established 1993

(410) 626-9996
Fax (410) 626-9997
www.transconcsi.com

2013 FEE SCHEDULE:

MINIMUM RETAINER FEE PER CASE:

One Thousand Dollars (\$1,000.00)

TIME:

Standard Rates:

9:00 a.m. to 5:00 p.m. Monday through Friday, plus expenses.

Reconstruction Expert	\$180.00 per hour
Reconstruction Expert Assistant	\$130.00 per hour
Administrative Staff Support	\$ 50.00 per hour

OVERTIME:

Any time required by "Client" outside normal working hours above (including travel time), will be charged a rate of time and a half (1.5) the Standard Rate on weekdays and two (2) times the Standard Rate on weekends and Federally observed holidays.

EXPENSES:

Automobile mileage:

Mileage will be charged at a rate of \$0.65 per mile in addition to the time rate.

Color Photographs:

4 X 6 = \$2.00 per photograph

8 X 10 = \$4.00 per photograph

Photocopies:

Black/White = \$0.10 per

Color = \$1.00 per page

Miscellaneous Expenses:

Outsourced or miscellaneous expenses will be billed at cost.